

**Ultra Low Emission Zone  
Consultation with the public and stakeholders**

**TfL's Report on the Consultation**

**Appendices**

March 2015

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## **Appendix A: Variation Order**

# GREATER LONDON AUTHORITY ACT 1999

## TRANSPORT ACT 2000

### Greater London Low Emission Zone Charging (Variation and Transitional Provisions) Order 2014

*Made*

*22 October 2014*

*Coming into force In accordance with articles 1(2) and 2(2)*

Whereas—

- (1) the Greater London Low Emission Zone Charging Order 2006 (“the LEZ Scheme Order”) imposes charges for the use of specified classes of motor vehicles on designated roads within a specified area of Greater London (“the Low Emission Zone”);
- (2) it appears to Transport for London expedient, for the purposes of facilitating the achievement of policies and proposals in the Mayor of London’s Transport Strategy published pursuant to section 142 of the Greater London Authority Act 1999(a) that it should make an Order for the purposes of varying the LEZ Scheme Order:

Now, therefore, Transport for London, in exercise of the powers conferred on it by sections 295 and 420(1) of the Greater London Authority Act 1999, by Schedule 23 to that Act, and of all other powers enabling it in that behalf, hereby makes the following Order:—

#### **Citation and commencement**

1.—(1) This Order may be cited as the Greater London Low Emission Zone Charging (Variation and Transitional Provisions) Order 2014.

(2) This Order shall come into force immediately on the day following the day on which the Mayor confirms it.

(3) In this Order “the LEZ Scheme” means the Scheme contained in the Schedule to the LEZ Scheme Order as varied and in force immediately before the coming into force of this Order.

#### **Variation of the LEZ Scheme**

2.—(1) The Scheme set out in the Schedule to this Order (the “Variation Scheme”), which varies the LEZ Scheme and contains transitional provisions, shall have effect.

(2) The Variation Scheme shall come into force on the day immediately following the day on which the Mayor confirms this Order.

Signed by authority of Transport for London

Dated 22 October 2014 Managing Director, Surface Transport

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(a) 1999 c.29; Schedule 23 as amended by the Transport Act 2000 (c.38), Schedule 13

## SCHEDULE TO THE ORDER

Article 2

### SCHEME VARYING THE LEZ SCHEME

#### **Preliminary**

1.—(1) The LEZ Scheme and the LEZ Scheme Order shall be varied in accordance with the provisions of this Schedule.

(2) Article 1 of the Scheme contained in the Schedule to the Greater London (Central Zone) Congestion Charging Order 2004 ('the Principal Scheme') shall apply, so far as material, for the interpretation of the Annex to this Variation Scheme as it applies for the interpretation of the Principal Scheme.

(3) Article 1 of the LEZ Scheme shall apply, so far as material, for the interpretation of this Variation Scheme as it applies for the interpretation of the LEZ Scheme.

#### **Arrangement of Instrument**

2.—(1) The Arrangement of Instrument of the Greater London Emission Order 2006 is amended as follows.

(2) For the numbers 9 to 16 substitute the numbers 11 to 18 respectively.

(3) For the numbers 5 to 8 substitute the numbers 6 to 9 respectively.

(4) After "4. Relevant vehicles" insert—

"5. Non-chargeable vehicles".

(5) For "Amount of charge" substitute "Amount of charge payable purchase of a licence".

(6) For "Application of charge to different date or vehicle" substitute "Amendment of licences".

(7) Before "11. Register of compliant and non-chargeable vehicles" as renumbered insert—

"10. ULEZ Auto Pay".

#### **Interpretation**

3.—(1) Article 1 of the LEZ Scheme is amended as follows.

(2) For paragraph (b) substitute "“CC Auto Pay Account” has the meaning given by article 4 of The Greater London (Central Zone) Congestion Charging Order 2004 as amended;”.

(3) In paragraph (c) for "article 6" substitute "article 7(1) or article 7(2)".

(4) In paragraph (f) for "class" substitute "Class" and for "paragraph 2" substitute "paragraph 3".

(5) Renumber paragraphs (r) and (s) as paragraphs (ff) and (gg) respectively.

(6) Renumber paragraph (q) as paragraph (aa).

(7) Renumber paragraphs (n) to (p) as paragraphs (x) to (z) respectively.

(8) Renumber paragraphs (k) to (m) as paragraphs (s) to (u) respectively.

(9) Renumber paragraph (j) as paragraph (o).

(10) Renumber paragraphs (g) to (i) as paragraphs (i) to (k) respectively.

(11) After paragraph (f) insert—

“(g) “compression ignition engine” means an internal combustion engine in which combustion is initiated by heat produced from compression of the air in the cylinder or combustion space;

(h) “compression-ignition vehicle” means a vehicle powered wholly or partly by a compression ignition engine;”.

(12) In paragraph (j) as renumbered—

(a) before “boundary plans” insert “low emission zone and ultra low emission zone”; and

(b) for “Faith Lawson House, 15-17 Dacre Street, London SW1 0NR” substitute “Palestra, 197 Blackfriars Road, London SE1 8NJ”.

(13) After paragraph (k) as renumbered insert—

“(l) “licence” means a licence purchased under article 8(1);

(m) “London bus network” and “London local service” have the meaning given by Chapter V of Part IV of the Greater London Authority Act 1999;

(n) “low emission vehicle” means a vehicle that Transport for London is satisfied meets the relevant standards referred to in article 6(1);”.

(14) In paragraph (o) as renumbered after “shaded on the” insert “low emission” and after “defined on the” insert “low emission zone”.

(15) After paragraph (o) as renumbered insert—

“(p) “low emission zone boundary plan” means a deposited plan specified in Part 2 of Annex 1 defining part of the boundary of the low emission zone;

(q) “low emission zone plan” means the plan corresponding with sheet A of Part 1 of Annex 1;

(r) “Millbrook London Transport Bus test cycle” means a two-phase drive cycle consisting of a medium speed ‘outer London’ phase simulating a journey from Brixton Station to Trafalgar Square and a low speed ‘inner London’ phase simulating a journey from Trafalgar Square to the end of Oxford Street, the details of which are specified on Transport for London’s web-site;”.

(16) In paragraph (s) as renumbered for “article 4(4)” substitute “article 5(1), (5(3) and 5(4)”.

(17) ~~(16)~~ After paragraph (u) as renumbered insert—

“(v) “positive ignition engine” means an internal combustion engine in which combustion is initiated by a localised high temperature in the combustion chamber produced by energy supplied from a source external to the engine;

(w) “positive ignition vehicle” means a vehicle powered wholly or partly by a positive ignition engine;”.

(18) ~~(17)~~ In paragraph (x) as renumbered for “9(1)” substitute “11(1)”.

(19) In paragraph (aa) as renumbered for “article 5” substitute “article 6”.

(20) ~~(18)~~ After paragraph (aa) as renumbered insert—

“(bb) “ultra low emission vehicle” means a vehicle that Transport for London is satisfied meets the relevant standards referred to in article 6(2);

(cc) “ultra low emission zone” means the area shown stippled on the ultra low emission zone plan the boundaries of which are defined on the ultra low emission zone boundary plans;

(dd) “ultra low emission zone boundary plan” means a deposited plan specified in Part 3 of Annex 1 defining part of the boundary of the ultra low emission zone by showing areas within the ultra low emission zone as stippled;

(ee) “ultra low emission zone plan” means the plan corresponding with sheet B of Part 1 of Annex 1”.

~~(21) (19)~~ For paragraph (gg) as renumbered substitute—

“(gg) “zone plans” means the low emission zone plan and the ultra low emission zone plan.”.

(22) In Annex 1 to the LEZ Scheme for “1(h)” substitute “1(j)”.

(23) In Annex 3 to the LEZ Scheme for “Article 15” substitute “Article 17”.

#### **Designation of roads in the charging area**

4.—(1) For article 3(2) substitute the following—

“(2) The designated roads are the low emission zone roads and the ultra low emission zone roads.”.

(2) After article 3(2) insert—

“(3) The low emission zone roads are all roads within the low emission zone.

(4) The ultra low emission zone roads are all roads within the ultra low emission zone.”.

#### **Relevant vehicles**

5.—(1) Article 4 is amended as follows.

(2) In paragraph (1) after “is a vehicle” insert “of a specified type and”.

(3) For paragraph (2) substitute—

“(2) The classes specified for the purposes of paragraph (1) are—

(a) for vehicles used within the low emission zone, Class M<sub>2</sub>, Class M<sub>3</sub>, Class N<sub>1</sub> ~~subclasses~~sub-classes (ii) and (iii), Class N<sub>2</sub> and Class N<sub>3</sub>; and

(b) for vehicles used within the ultra low emission zone, Class L (motorcycles), Class L (compression ignition tricycles and quadricycles), Class L (positive ignition tricycles and quadricycles), Class M<sub>1</sub>, Class M<sub>2</sub>, Class M<sub>3</sub>, Class N<sub>1</sub> ~~subclasses~~sub-classes (i), (ii) and (iii), Class N<sub>2</sub> and Class N<sub>3</sub>.”.

(4) For paragraphs (3) to (5) substitute—

“(3) A vehicle used within the low emission zone is of a type specified for the purposes of paragraph (1) if it is a compression ignition vehicle.

(4) A vehicle used within the ultra low emission zone is of a type specified for the purposes of paragraph (1) if it is a compression ignition vehicle or a positive ignition vehicle.

(5) A vehicle is a compliant vehicle—

(a) when used within the low emission zone, if the vehicle meets the standards required of a low emission vehicle for the purposes of this Scheme;

(b) when used within the ultra low emission zone, if the vehicle meets the standards required of an ultra low emission vehicle for the purposes of this Scheme; and

(c) particulars of the vehicle are for the time being entered in the register.”.

(5) Omit paragraph (6).

#### **Non-chargeable vehicles**

6.—(1)— Renumber articles 5 to 8 as articles 6 to 9 respectively.

(2) After article 4 as amended insert—

### “Non-chargeable vehicles

5.—(1) A vehicle is a non-chargeable vehicle for the purposes of use within the low emission zone and the ultra low emission zone if—

- (a) the vehicle falls within one of the classes of non-chargeable vehicles specified in paragraph (2); and
- (b) particulars of the vehicle are for the time being entered in the register.

(2) The following classes of vehicle are specified for the purposes of paragraph (1)(a)—

- (a) ~~Any~~any vehicle which belongs to any of Her Majesty’s forces or is in use for the purposes of any of those forces;
- (b) any vehicle that Transport for London is satisfied is used for naval, military or air force purposes and not registered under the 1994 Act, while it is being used on a road by a member of a visiting force or a member of a headquarters or organisation;
- (c) ~~any vehicle constructed before 1st January 1973;~~(d) any showman’s vehicle that is neither a trailer nor a semi-trailer and is permanently fitted with a special type of body or superstructure forming part of the equipment of the show of the person in whose name the vehicle is registered;
- (ed) any vehicle in respect of which Transport for London is satisfied that it is not a vehicle constructed or adapted for general use on roads.

(3) A vehicle is a non-chargeable vehicle for the purposes of use within the low emission zone if it was constructed before 1st January 1973 and particulars of the vehicle are for the time being entered in the register.

(4) A vehicle is a non-chargeable vehicle for the purpose of use within the ultra low emission zone if it is —

- (a) a vehicle licensed as a hackney carriage under section 6 of the Metropolitan Public Carriage Act ~~1869~~.1869; or
- (b) an exempt vehicle within the meaning of paragraph 1A of Schedule 2 to the 1994 Act and particulars of the vehicle are for the time being entered in the register.

(45) In this article—

- (a) “member of a visiting force” and “member of a headquarters or organisation” have the meaning given in paragraph 1(2) of Schedule 5 to the Road Vehicles (Registration and Licensing) Regulations 2002;
- (b) “showman’s vehicle” means a vehicle that is—
  - (i) registered under the 1994 Act or, in a country other than the United Kingdom, in accordance with that country's rules governing the registration of such vehicles, in the name of a person following the business of a travelling showman; and
  - (ii) used solely by that person for the purposes of his business and no other purpose;
- (c) “trailer” and “semi-trailer” have the meaning given by regulation 3 of the Road Vehicles (Construction and Use) Regulations 1986.”.

### Emissions standards

7. For article 6 as renumbered substitute—

“6.—(1) A vehicle meets the standards required of a low emission vehicle for the purposes of this Scheme if Transport for London is satisfied that the vehicle meets the emissions standards specified for that vehicle in Table 1 of Part 1 of Annex 2.



(2) A vehicle meets the standards required of an ultra low emission vehicle for the purposes of this Scheme if—

- (a) Transport for London is satisfied that the vehicle meets the emissions standards specified for that vehicle in Tables 2 to 6 of Part 2 of Annex 2; or
- (b) in the case of a vehicle falling within Class M<sub>3</sub>, Transport for London is satisfied that the vehicle—
  - (i) operates wholly or partly by means of an electrically powered propulsion system;
  - (ii) is certified by the appropriate national approval authority as having been manufactured to satisfy Euro V emissions standards;
  - (iii) would emit less than 2.05 g/km of NO<sub>x</sub> when tested using the Millbrook London Transport Bus test cycle; and
  - (iv) is used for the purposes of providing a London local service which is part of the London bus network in accordance with section 181(4) of the Greater London Authority Act 1999.”.

### **Imposition of charges**

**8.** For article 7 as renumbered substitute—

“7.—(1) Subject to the following provisions of this Scheme, a charge of an amount specified in article 9(1) is imposed in respect of any relevant vehicle of ~~class~~Class M<sub>2</sub>, Class N<sub>1</sub> ~~subclasses~~sub-classes (ii) and (iii), N<sub>2</sub> or Class N<sub>3</sub> for each charging day on which it is at any time used on one or more low emission zone roads.

(2) Subject to the following provisions of this Scheme, a charge of an amount specified in article 9(2) is imposed in respect of a relevant vehicle of Class L (motorcycles), Class L (compression ignition tricycles and quadricycles), Class L (positive ignition tricycles and quadricycles), Class M<sub>1</sub>, Class M<sub>2</sub>, Class M<sub>3</sub>, Class N<sub>1</sub> ~~subclasses~~sub-classes (i), (ii) and (iii), Class N<sub>2</sub> and Class N<sub>3</sub> for each charging day which falls on or after 7 September 2020 on which it is at any time used on one or more ultra low emission zone roads.”.

### **Payment of charges**

**9.** For article 8 as renumbered substitute—

“8.—(1) A charge imposed by article 7 shall be paid by the purchase of a licence from Transport for London in accordance with the provisions of this article and, except where paragraphs (11) and (12) or (13) and (14) apply, a licence shall be issued for a specified period falling on, or beginning with, a specified date.

(2) Except in a case where paragraph (13) applies a licence shall be purchased in respect of a particular vehicle.

(3) A licence may be purchased for one of the following periods—

- (a) a single charging day;
- (b) a period of 7 consecutive charging days;
- (c) a period of 31 consecutive charging days;
- (d) a period of 365 consecutive charging days.

(4) A vehicle referred to in paragraph (2) shall be identified by its registration mark; and—

- (a) the purchaser of a licence shall specify to Transport for London the registration mark of the vehicle in respect of which that charge is paid;

- (b) a licence shall not be valid in respect of any vehicle having a registration mark different from the mark so specified.
- (5) A licence for a single charging day may only be purchased—
- (a) on a day falling within the period of 64 working days immediately preceding the charging day concerned;
  - (b) on that charging day;
  - (c) on or before the next working day after that charging day; or
  - (d) in respect of a charge imposed by article 7(2), by ULEZ Auto Pay in accordance with article 10.
- (6) A licence for a period of 7, 31 or 365 charging days may only be purchased—
- (a) on the first charging day of the period concerned; or
  - (b) on a day falling within the period of 64 working days immediately preceding that charging day.
- (7) Charges imposed by this Scheme shall be paid by one of the following means set out in paragraphs (a) to (c) of this article or by such other means as Transport for London may in the particular circumstances of the case accept—
- (a) a charge for a daily licence—
    - (i) specified in article 9(1) by post, call centre or on-line;
    - (ii) specified in article 9(2) by ULEZ Auto Pay, post, call centre, or on-line;
  - (b) a charge for a licence for 7, 31 or 365 consecutive charging days as set out in article 8(3), by post, call centre or on-line;
  - (c) charges payable by fleet operators—
    - (i) in respect of the purchase of a licence, by direct debit;
    - (ii) as specified in paragraph (14)(b) (additional annual charge per vehicle), by direct debit;
  - (d) a charge accompanying an application for the amendment of a licence under article 13, by call centre or on-line.
- (8) For the purposes of this paragraph and paragraph (7)—
- (a) a charge is paid by post if the form provided by Transport for London for payment of the particular charge is sent, duly completed and accompanied by a cheque, or completed to enable payment to be made by credit or debit card, by pre-paid post to the address given on the form;
  - (b) a charge is paid by call centre if it is paid by credit or debit card through the call centre provided for the purpose by Transport for London;
  - (c) a charge is paid on-line if it is paid by credit or debit card through the web-site provided for the purpose by Transport for London;
  - (d) a charge is paid by ULEZ Auto Pay if it is paid in accordance with the provisions of article 10;
  - (e) “cheque” means a cheque, or postal order, crossed “account payee” and drawn in favour of “Transport for London Low Emission Zone”;
  - (f) “credit or debit card” means—
    - (i) “Visa”, “MasterCard”, “Delta”, “Maestro”; or
    - (ii) any other credit or debit card the name of which is for the time being published by Transport for London on its web-site as being acceptable to it.

(9) Notwithstanding article 1(3)(a), where a charge is paid by cheque in accordance with paragraph (8)(a), the cheque and the duly completed form must be received by Transport for London not later than 10 working days before the charging day concerned.

(10) Where a licence is purchased otherwise than in cash and payment is not received by Transport for London (whether because a cheque is dishonoured, a direct debit, credit card or debit card payment is declined, or otherwise), the charge to which the licence relates shall be treated as not paid and the licence shall be void.

(11) Notwithstanding paragraph (1) a licence may, at the discretion of Transport for London, be purchased for a charging day which is to be specified after the grant of the licence in accordance with the conditions subject to which the licence is granted.

(12) The conditions referred to in paragraph (11) may in particular include conditions as to the time within which, and the manner in which, a charging day is to be specified for the licence.

(13) Notwithstanding paragraphs (1) and (2), a fleet operator which has entered into an agreement with Transport for London may purchase licences in respect of charges imposed by article 7(2) which, to the extent provided for in that agreement, cover the use or keeping on a designated road of any relevant vehicle specified in the agreement on any charging day within a period so specified.

(14) An agreement under paragraph (13) shall be on such terms as Transport for London may in each case determine but—

- (a) a vehicle shall not be specified as mentioned in paragraph (13)—
  - (i) unless it is a relevant vehicle controlled and managed by the fleet operator for the purposes of a business which is carried on by the operator or by a person to whom the operator is a contractor and the minimum number of motor vehicles is so specified in relation to that business; or
  - (ii) if the vehicle is a specified vehicle under article ~~6A.10~~; and
- (b) the agreement shall provide for an additional annual charge of £10 to be paid to Transport for London in respect of each motor vehicle specified as mentioned in paragraph (13).

(15) In this article—

- (a) "fleet operator" means a person who—
  - (i) controls and manages the minimum number of motor vehicles used for the purposes of a business carried on by that person, whether or not those vehicles are owned or driven by that person; or
  - (ii) is a contractor employed by another person to control and manage the minimum number of motor vehicles for the purposes of a business carried on by that person, whether or not the vehicles are owned or driven by that other person; and
- (b) "the minimum number" is 6 or more.”.

### **Amount of charge payable by purchase of a licence**

**10.**—(1) In the heading of article 9 as renumbered after “charge” insert “payable by purchase of a licence”.

(2) For article 9 as renumbered substitute—

“**9.**—(1) The cost of a licence for a charge imposed by article 7(1) shall be—

- (a) £200 per charging day in respect of a relevant vehicle of Class M<sub>3</sub>, Class N<sub>2</sub> or Class N<sub>3</sub>;
- (b) £100 per charging day in respect of a relevant vehicle of Class M<sub>2</sub> and Class N<sub>1</sub> sub-classes (ii) and (iii).

- (2) The cost of a licence for a charge imposed by article 7(2) shall be—
- (a) £100 per charging day in respect of a relevant vehicle of Class M<sub>3</sub>, Class N<sub>2</sub> and Class N<sub>3</sub>;
  - (b) £12.50 per charging day in respect of a relevant vehicle of Class L (motorcycles), Class L (compression ignition tricycles and quadricycles), Class L (positive ignition tricycles and quadricycles), Class M<sub>1</sub>, Class M<sub>2</sub>, and Class N<sub>1</sub> ~~subclasses~~sub-classes (i), (ii) and (iii).”.

## **ULEZ Auto Pay**

### **11. After article 9 as renumbered insert—**

#### **“ULEZ Auto Pay**

**10.**—(1) A charge is paid by ULEZ Auto Pay where the conditions set out in paragraph (2) are met.

- (2) The conditions referred to in paragraph (1) are—
- (a) that the charge concerned relates to a ULEZ Auto Pay Account that has been registered with Transport for London;
  - (b) that the ULEZ Auto Pay Account concerned has not been suspended or cancelled under paragraph (9);
  - (c) that the relevant vehicle concerned was on the charging day concerned a specified vehicle in relation to the ULEZ Auto Pay Account concerned; and
  - (d) that on the billing day payment in relation to the ULEZ Auto Pay Account concerned is made to Transport for London in accordance with paragraph (8).
- (3) An application for registration for a ULEZ Auto Pay Account—
- (a) may only be made by a person of 18 years of age or over at the date of that application;
  - (b) shall include details of—
    - (i) the credit or debit card from which Transport for London may take payment for charges under paragraphs (7) and (8); or
    - (ii) the bank account from which Transport for London may take payment by direct debit for charges under paragraphs (7) and (8);
    - (iii) any CC Auto Pay Account held by the applicant;
  - (c) shall be made by such means as Transport for London may accept;
  - (d) shall include all such other information as Transport for London may reasonably require,

and Transport for London may refuse such an application where the applicant has previously registered for a ULEZ Auto Pay Account or a CC Auto Pay Account that has subsequently been suspended or cancelled under paragraph (9) or article 6A(9) of The Greater London (Central Zone) Congestion Charging Order 2004 respectively or in such other circumstances as Transport for London may determine.

(4) A vehicle is a specified vehicle under paragraph (2)(c) if particulars of the vehicle are entered on the register of specified ULEZ Auto Pay vehicles.

(5) An application to enter particulars of a vehicle or vehicles on the register of specified ULEZ Auto Pay vehicles—

- (a) shall identify the ULEZ Auto Pay Account in relation to which the vehicle or vehicles are to be registered;

- (b) shall include all such other information as Transport for London may reasonably require;
- (c) shall be made by such means as Transport for London may accept; and
- (d) shall be accompanied by a charge of £10 per vehicle which is not also a specified vehicle for the purposes of article 6A(4) of The Greater London (Central Zone) Congestion Charging Order 2004 in respect of which registration is sought,

provided that the maximum number of specified vehicles registered in relation to any ULEZ Auto Pay Account shall be five, or such other number as Transport for London may determine and publish on its congestion charging web site.

(6) No vehicle may be a specified vehicle in relation to more than one ULEZ Auto Pay Account.

(7) In respect of each specified vehicle which is not also a specified vehicle for the purposes of article 6A(4) of The Greater London (Central Zone) Congestion Charging Order 2004, a charge of £10 shall be incurred annually on the anniversary of the date of entry of particulars of that specified vehicle in the register of specified ULEZ Auto Pay vehicles.

(8) Transport for London shall on the billing day take the automatic payment from—

- (a) the credit or debit card specified under paragraph (3)(b) or such other credit or debit card as Transport for London may in the particular circumstances of the case accept; or
- (b) by way of direct debit from the bank account specified under paragraph (3)(b) or such other bank account as Transport for London may in the particular circumstances of the case accept.

(9) Where payment under paragraph (8) is declined for any reason—

- (a) Transport for London may accept payment by any other means it considers suitable in the particular circumstances of the case; and
- (b) where all outstanding charges under paragraph (8) are not paid within such period as Transport for London may specify Transport for London may suspend or cancel the ULEZ Auto Pay Account to which those charges relate.

(10) In this article—

- (a) the “automatic payment” means in respect of each ULEZ Auto Pay Account a payment comprising the costs of—
  - (i) the purchase of a licence for each charge imposed under article 4 in respect of each specified vehicle that is a relevant vehicle registered to that ULEZ Auto Pay Account; and
  - (ii) each charge under paragraph (7),

that have been incurred and that Transport for London has identified as being payable during the billing period immediately preceding the billing period within which the billing day concerned falls;

- (b) “billing day” in respect of any billing period means a day falling no earlier than 5 working days after the last day of that billing period or such other day as Transport for London may in the particular circumstances of the case determine on which Transport for London shall take the automatic payment under paragraph (8);
- (c) “ULEZ Auto Pay Account” means an agreement entered into with Transport for London for the purposes of paying charges imposed under article 7(2) by the purchase of licences in arrears by recurring credit or debit card payment;
- (d) “billing period” in relation to a ULEZ Auto Pay Account means a period of one month or such other period as Transport for London may determine and specify on its congestion charging web site in each case beginning with the day on which Transport

for London accepts an application for the registration of a ULEZ Auto Pay Account or such other day as Transport for London may in the particular circumstances of the case accept;

- (e) “credit or debit card” means any credit or debit card the name of which is for the time being published by Transport for London on its congestion charging web site as being acceptable to it for the purpose of payment by ULEZ Auto Pay; and
- (f) “register of specified ULEZ Auto Pay vehicles” means a register maintained by Transport for London of those vehicles in respect of which a successful application for registration has been made under paragraph (5).

(11) A ULEZ Auto Pay Account shall be subject to such terms as Transport for London shall determine, provided that it does not conflict with the provisions of this article.”.

### **Register of compliant and non-chargeable vehicles**

**12.** In article 11 as renumbered for “article 4(3) and (4)” substitute “articles 4(5) and 5(1), [5\(3\)](#) and [5\(4\)](#)”.

### **Refunds of charges**

**13.** For article 12 as renumbered substitute—

“**12.**—(1) The purchaser of a licence may surrender the licence and obtain a refund in accordance with the following provisions of this article.

(2) An application for a refund shall be made on-line, by telephone or by post to Transport for London and,

- (a) in the case of a licence in respect of a single charging day may only relate to a charge imposed by article 7(1);
- (b) in the case of a licence for a period of 7 charging days—
  - (i) may only relate to a refund for the whole of that period;
  - (ii) must, in the case of an application made by telephone, be made on or before the working day immediately preceding the first charging day to which the licence relates;
  - (iii) must, in the case of an application by post or on-line, be received by Transport for London no later than 6 working days before the first charging day to which the licence relates.

(3) The application shall be accompanied by—

- (a) in the case of an application by post, one of the following documents -
  - (i) the receipt for the licence concerned (“the receipt”);
  - (ii) a photocopy of the receipt; or
  - (iii) a statement of the number of the receipt;
- (b) in the case of an application made on-line or by telephone, a statement of the number of the receipt; and
- (c) in the case of an application made on-line or by post or telephone in relation to a licence for a period of 31 or 365 days, a statement of the date from which the applicant wishes the licence to be surrendered,

and the applicant shall provide such further information to Transport for London as it may reasonably require.

(4) The amount of the refund for a charge shall be—

- (a) in the case of a licence for a single day, the charge paid for the licence;
- (b) in the case of a licence for a period of 7 days, the charge paid for the licence, less £10; and
- (c) in the case of a licence for a period of 31 or 365 days, the product of the number of unexpired charging days multiplied by the charge paid per day, less £10.

(5) For the purposes of paragraph (4)(c) the number of unexpired charging days shall be the number of whole charging days in the period of the licence still to run from and including the refund date.

- (6) In paragraph (5) "the refund date" means whichever is the later of the following—
  - (a) the date specified by the applicant under paragraph (3)(c); and
  - (b) in the case of an application for a refund made by post, the last day of the period of 7 working days beginning with the day on which the application is received; or
  - (c) in the case of an application for a refund made by telephone, the next working day after the day on which the application is made.”.

### **Amendment of licences**

**14.**—(1) For the heading of article 13 as renumbered substitute—

**“Amendment of licences”.**

(2) For article 13 as renumbered substitute—

**“13.**—(1) Subject to the following provisions of this article, on an application by the holder of a licence and on payment of a charge of £2.50, Transport for London may amend the licence so as to substitute—

- (a) a different day as the first day of the period for which the licence is to run; or
- (b) with effect from a specified date, a registration mark different from that specified under article 8(4).

(2) Where purported payment of a charge under paragraph (1) is made otherwise than in cash and payment is not received by Transport for London (whether because a cheque is dishonoured, a direct debit, credit card or debit card payment is declined, or otherwise), the charge shall be treated as not paid and the licence to which it relates shall not be treated as having been amended.

(3) An application under paragraph (1) shall—

- (a) be made on-line, by post or by telephone;
- (b) include particulars of the receipt number of the licence and such evidence as Transport for London may reasonably require to show that the applicant is the holder of the licence; and
- (c) specify a day to be substituted under paragraph (1)(a) which complies with paragraph (5) or, as the case may be, specify the registration mark to be substituted under paragraph (1)(b) and a date for the substitution which complies with paragraph (6);

and, in this article, "the application date" in relation to an application means the day on which an application which complies with the requirements of sub-paragraphs (a), (b) and (c) is received by Transport for London.

(4) An application under paragraph (1) shall be of no effect unless the application date falls—

- (a) in the case of a telephone application under sub-paragraph (1)(a), on or before the working day immediately preceding the charging day for which the licence was

- originally purchased or, in the case of a licence for a period of days, the first day of the period for which the licence was originally purchased; or
- (b) in the case of a postal or on-line application under sub-paragraph (1)(a) or an on-line application under sub-paragraph (1)(b), the beginning of the period of 7 working days ending with that day.
- (5) No date may be substituted under paragraph (1)(a) which is—
- (a) earlier than—
    - (i) in the case of a postal or on-line application, the last day of the period of 8 working days beginning with the application date; or
    - (ii) in the case of a telephone application, the first charging day falling on or after the application date; or
  - (b) later than the last day of the period of 65 working days beginning with the application date.
- (6) No date may be specified for the purposes of paragraph (1)(b) which is earlier than—
- (a) in the case of a postal or on-line application, the last day of the period of 7 working days beginning with the application date; or
  - (b) in the case of a telephone application, the first charging day falling on or after the application date.”.

#### **Penalty charge for non-payment of charge**

**15.**—(1) Article 14 as renumbered is amended as follows.

(2) In paragraph (1)(a) for “article 6” substitute “article 7”.

(3) In paragraph (1)(b) for “article 7” substitute “article 8”.

(4) For paragraph (3) substitute—

“(3) The amount of a penalty charge payable in accordance with paragraph (1) shall be—

- (a) in respect of a penalty charge imposed in relation to the non-payment of a charge imposed by article 7(1)—
  - (i) for relevant vehicles of Classes M<sub>3</sub>, N<sub>2</sub> and N<sub>3</sub>, £1,000 but, if the penalty charge is paid before the end of the fourteenth day of the payment period, the amount shall be reduced by one half to £500; or;
  - (ii) for relevant vehicles of Class M<sub>2</sub> and ~~class~~Class N<sub>1</sub> sub-classes (ii) and (iii), £500 but, if the penalty charge is paid before the end of the fourteenth day of the payment period, the amount shall be reduced by one half to £250;
- (b) in respect of a penalty charge imposed in relation to the non-payment of a charge imposed by article 7(2)—
  - (i) for relevant vehicles of Class M<sub>3</sub>, Class N<sub>2</sub> and Class N<sub>3</sub>, £1,000 but, if the penalty charge is paid before the end of the fourteenth day of the payment period, the amount shall be reduced by one half to £500; or;
  - (ii) for relevant vehicles of Class L (motorcycles), Class L (compression ignition tricycles and quadricycles), Class L (positive ignition tricycles and quadricycles), Class M<sub>1</sub>, Class M<sub>2</sub> and Class N<sub>1</sub> ~~subclasses~~sub-classes (i), (ii) and (iii), £130 but, if the penalty charge is paid before the end of the fourteenth day of the payment period, the amount shall be reduced by one half to £65.”.

(5) For paragraph (4) substitute—



“(4) Where a charge certificate is issued in accordance with regulation 17(1) of the Road User Charging (Enforcement and Adjudication) (London) Regulations 2001, the amount of the penalty charge to which it relates shall be increased by one half to—

- (a) in respect of a penalty charge imposed in relation to the non-payment of a charge imposed by article 7(1)—
  - (i) for relevant vehicles of Classes M<sub>3</sub>, N<sub>2</sub> and N<sub>3</sub>, £1,500; or
  - (ii) for relevant vehicles of ~~class~~Class M<sub>2</sub> and ~~class~~Class N<sub>1</sub> sub-classes (ii) and (iii), £750;
- (b) in respect of a penalty charge imposed in relation to the non-payment of a charge imposed by article 7(2)—
  - (i) for relevant vehicles of Class M<sub>3</sub>, Class N<sub>2</sub> and Class N<sub>3</sub>, £1,500; or
  - (ii) for relevant vehicles of Class L (motorcycles), Class L (compression ignition tricycles and quadricycles), Class L (positive ignition tricycles and quadricycles), Class M<sub>1</sub>, Class M<sub>2</sub> and Class N<sub>1</sub> ~~subclasses~~sub-classes (i), (ii) and (iii), £195.”.

### Annex 1 Plans

16.—(1) Omit the row of the table in Annex 1 corresponding with sheet A.

(2) After the table in Annex 1 insert—

#### “PART 3 – ULTRA LOW EMISSION ZONE BOUNDARY PLANS

| (1)<br><i>Sheet.</i> | (2)<br><i>Drawing No. &amp; revision letter</i> | (3)<br><i>Signatory</i> |
|----------------------|---|-------------------------|
| 1                    | OSIC/WEZ2010/1                                  | David Brown             |
| 2                    | OSIC/WEZ2010/2                                  | David Brown             |
| 3                    | OSIC/WEZ2010/3                                  | David Brown             |
| 4                    | OSIC/WEZ2010/4                                  | David Brown             |
| 5                    | OSIC/WEZ2010/5                                  | David Brown             |
| 6                    | OSIC/WEZ2010/6                                  | David Brown             |
| 7                    | OSIC/WEZ2010/7                                  | David Brown             |
| 8                    | OSIC/WEZ2010/8                                  | David Brown             |
| 9                    | OSIC/WEZ2010/9                                  | David Brown             |
| 10                   | OSIC/WEZ2010/10                                 | David Brown             |
| 11                   | OSIC/WEZ2010/11                                 | David Brown             |
| 12                   | OSIC/WEZ2010/12                                 | David Brown             |

|    |                 |             |
|----|-----------------|-------------|
| 13 | OSIC/WEZ2010/13 | David Brown |
| 14 | OSIC/WEZ2010/14 | David Brown |
| 15 | OSIC/WEZ2010/15 | David Brown |
| 16 | OSIC/WEZ2010/16 | David B     |
| 17 | OSIC/WEZ2010/17 | David Brown |
| 18 | OSIC/WEZ2010/18 | David Brown |
| 19 | OSIC/WEZ2010/19 | David Brown |
| 20 | OSIC/WEZ2010/20 | David Brown |
| 21 | OSIC/WEZ2010/21 | David Brown |
| 22 | OSIC/WEZ2010/22 | David Brown |
| 23 | OSIC/WEZ2010/23 | David Brown |
| 24 | OSIC/WEZ2010/24 | David Brown |
| 25 | OSIC/WEZ2010/25 | David Brown |
| 26 | OSIC/WEZ2010/26 | David Brown |
| 27 | OSIC/WEZ2010/27 | David Brown |
| 28 | OSIC/WEZ2010/28 | David Brown |
| 29 | OSIC/WEZ2010/29 | David Brown |
| 30 | OSIC/WEZ2010/30 | David Brown |
| 31 | OSIC/WEZ2010/31 | David Brown |
| 32 | OSIC/WEZ2010/32 | David Brown |
| 33 | OSIC/WEZ2010/33 | David Brown |
| 34 | OSIC/WEZ2010/34 | David Brown |
| 35 | OSIC/WEZ2010/35 | David Brown |
| 36 | OSIC/WEZ2010/36 | David Brown |
| 37 | OSIC/WEZ2010/37 | David Brown |
| 38 | OSIC/WEZ2010/38 | David Brown |

|    |                 |             |
|----|-----------------|-------------|
| 39 | OSIC/WEZ2010/39 | David Brown |
| 40 | OSIC/WEZ2010/40 | David Brown |
| 41 | OSIC/WEZ2010/41 | David Brown |
| 42 | OSIC/WEZ2010/42 | David Brown |
| 43 | OSIC/WEZ2010/43 | David Brown |
| 44 | OSIC/WEZ2010/44 | David Brown |

”.

(3) Before the first table in Annex 1 insert—

“PART 1 – ZONE PLANS

| <i>(1)</i><br><i>Sheet.</i> | <i>(2)</i><br><i>Drawing No. &amp; revision letter</i> | <i>(3)</i><br><i>Signatory</i> |
|-----------------------------|--|--------------------------------|
| A                           | G060245A-DD-300 Revision B                             | David Brown                    |
| B                           | OSIC/ULEZ2014/B  | Leon Daniels                   |

PART 2 – LOW EMISSION ZONE BOUNDARY PLANS”.

**Annex 2 – Emissions Standards**

17. For Annex 2 substitute—

“ANNEX 2 TO THE SCHEME

Article 6

PART 1

EMISSIONS STANDARDS FOR LOW EMISSION VEHICLES

1.—(1) Subject to paragraph (2) a vehicle meets the standards set out in Table 1 if—

- (a) the vehicle is certified by the appropriate national approval authority as having been manufactured to satisfy the EC emissions standard specified for that vehicle in column (e) of the Table;
- (b) the vehicle has been adapted, by means of an exhaust after-treatment system or otherwise, so that the limit values for the emission of particulate matter specified for the vehicle in column (f) would not be exceeded during the appropriate test or tests specified in column (g) of the Table; or

(c) in respect of all other vehicles, the limit values for the emission of particulate matter specified for the vehicle in column (f) would not be exceeded during the appropriate test or tests specified in column (g) of the Table.

(2) (a) In respect of a vehicle falling within a class specified in row (4) or row (7) of Table 1 the Type I test shall not be considered an appropriate test for the purposes of determining whether the vehicle is a compliant vehicle unless that vehicle has been approved as a light duty vehicle for emissions purposes under Council Directive 70/220/EEC.

(b) In respect of a vehicle—

- (i) falling within a class specified in rows (4) or (5) of Table 1; and
- (ii) fitted with an exhaust after-treatment system,

the ESC test shall not be considered an appropriate test for the purposes of determining whether the vehicle is a compliant vehicle.

Table 1 — STANDARDS FOR LOW EMISSION VEHICLES

| <i>(a)</i><br>Row No. | <i>(b)</i><br>Class of vehicle  | <i>(c)</i><br>Maximum mass of vehicle, where relevant (kilograms) | <i>(d)</i><br>Reference mass of vehicle, where relevant (kilograms) | <i>(e)</i><br>EC emissions standard | <i>(f)</i><br>Limit values for mass of particulate matter emissions | <i>(g)</i><br>Appropriate tests |
|-----------------------|---------------------------------|---|---|-------------------------------------|---|---------------------------------|
| (1)                   | M <sub>2</sub>                  | not exceeding 2,500   |   | Euro 3                              | 0.05 g/km   | Type I                          |
| (2)                   | M <sub>2</sub>                  | exceeding 2,500 and not exceeding 3,500                           | exceeding 1,305 and not exceeding 1,760                             | Euro 3                              | 0.07 g/km   | Type I                          |
| (3)                   | M <sub>2</sub>                  | exceeding 2,500 and not exceeding 3,500                           | exceeding 1,760   | Euro 3                              | 0.10g/km  | Type I                          |
| (4)                   | M <sub>2</sub>                  | exceeding 3,500   | not exceeding 2,840   | Euro 3 or Euro III                  | 0.10 g/km (Type I), 0.10g/kWh (ESC) or 0.16g/kWh (ETC)              | Type I, ESC or ETC              |
| (5)                   | M <sub>2</sub>                  | exceeding 3,500   | exceeding 2,840   | Euro III                            | 0.10 g/kWh (ESC) or 0.16g/kWh (ETC)                                 | ESC or ETC                      |
| (6)                   | M <sub>3</sub> , N <sub>3</sub> |   |   | Euro IV                             | 0.02 g/kWh (ESC) and 0.03 g/kWh (ETC)                               | both ESC and ETC                |
| (7)                   | N <sub>2</sub>                  |   | not exceeding 2,840   | Euro 4 or Euro IV                   | 0.06g/km (Type I) or 0.02 g/kWh (ESC) and 0.03 g/kWh (ETC)          | Type I or both ESC and ETC      |
| (8)                   | N <sub>2</sub>                  |   | exceeding 2,840   | Euro IV                             | 0.02 g/kWh (ESC) and  | both ESC and ETC                |

|      |                                     |  |  |        |                     |        |
|------|-------------------------------------|--|--|--------|---------------------|--------|
|      |                                     |  |  |        | 0.03 g/kWh<br>(ETC) |        |
| (9)  | N <sub>1</sub><br>sub-classes (ii)  |  |  | Euro 3 | 0.07 g/km           | Type I |
| (10) | N <sub>1</sub><br>sub-classes (iii) |  |  | Euro 3 | 0.10 g/km           | Type I |

## PART 2

### EMISSIONS STANDARDS FOR ULTRA LOW EMISSION VEHICLES

2.—(1) A vehicle meets the standards set out in Tables 2 to 6 if—

- (a) the vehicle is certified by the appropriate national approval authority as having been manufactured to satisfy the EC emissions standard specified for that vehicle in column (d) of the Table;
- (b) the vehicle has been adapted, by means of an exhaust after-treatment system or otherwise, so that the limit values for the emission of NO<sub>x</sub> specified for the vehicle in column (e) would not be exceeded during the appropriate test or tests specified in column (f) of the Table; or
- (c) in respect of all other vehicles, the limit values for the emission of NO<sub>x</sub> specified for the vehicle in column (e) would not be exceeded during the appropriate test or tests specified in column (f) of the Table.

TABLE 2 - EURO VI STANDARDS FOR COMPRESSION IGNITION CLASS M & N VEHICLES

| (a)<br>Row No. | (b)<br>Class of vehicle         | (c)<br>Reference mass of vehicle, where relevant (kilograms) | (d)<br>EC emissions standard | (e)<br>Limit values for NO <sub>x</sub> (grams per kilowatt hour) | (f)<br>Appropriate tests |
|----------------|---------------------------------|--|------------------------------|---|--------------------------|
| (1)            | M <sub>1</sub>                  | exceeding 2610   | Euro VI                      | 0.4 (WHSC) and 0.46 (WHTC)  | WHSC and WHTC            |
| (2)            | M <sub>2</sub>                  | exceeding 2610   | Euro VI                      | 0.4 (WHSC) and 0.46 (WHTC)  | WHSC and WHTC            |
| (3)            | M <sub>3</sub> , N <sub>3</sub> |  | Euro VI                      | 0.4 (WHSC) and 0.46 (WHTC)  | WHSC and WHTC            |
| (4)            | N <sub>2</sub>                  | exceeding 2610   | Euro VI                      | 0.4 (WHSC) and 0.46 (WHTC)  | WHSC and WHTC            |
| (5)            | N <sub>1</sub>                  | exceeding 2610   | Euro VI                      | 0.4 (WHSC) and 0.46 (WHTC)  | WHSC and WHTC            |

TABLE 3 - EURO VI STANDARDS FOR POSITIVE IGNITION CLASS M & N VEHICLES

| <i>(a)</i><br>Row<br>No. | <i>(b)</i><br>Class of<br>vehicle | <i>(c)</i><br>Reference mass of vehicle,<br>where relevant<br>(kilograms) | <i>(d)</i><br>EC<br>emissions<br>standard | <i>(e)</i><br>Limit values for<br>$NO_x$ (grams per<br>kilowatt hour) | <i>(f)</i><br>Appropriate<br>tests |
|--------------------------|-----------------------------------|---|---|---|------------------------------------|
| (1)                      | M <sub>1</sub>                    | exceeding 2610  | Euro VI                                   | 0.46  | WHTC                               |
| (2)                      | M <sub>2</sub>                    | exceeding 2610  | Euro VI                                   | 0.46  | WHTC                               |
| (3)                      | M <sub>3</sub> , N <sub>3</sub>   |   | Euro VI                                   | 0.46  | WHTC                               |
| (4)                      | N <sub>2</sub>                    | exceeding 2610  | Euro VI                                   | 0.46  | WHTC                               |
| (5)                      | N <sub>1</sub>                    | exceeding 2610  | Euro VI                                   | 0.46  | WHTC                               |

TABLE 4 - EURO 6 STANDARDS FOR COMPRESSION IGNITION CLASS M & N VEHICLES

| <i>(a)</i><br>Row<br>No. | <i>(b)</i><br>Class of<br>vehicle | <i>(c)</i><br>Reference mass of vehicle,<br>where relevant<br>(kilograms) | <i>(d)</i><br>EC<br>emissions<br>standard | <i>(e)</i><br>Limit values for<br>$NO_x$ (grams per<br>kilometre) | <i>(f)</i><br>Appropriate<br>tests |
|--------------------------|-----------------------------------|---|---|---|------------------------------------|
| (1)                      | M <sub>1</sub>                    | not exceeding 2610  | Euro 6                                    | 0.18  | Type I                             |
| (2)                      | M <sub>2</sub>                    | not exceeding 2610  | Euro 6                                    | 0.18  | Type I                             |
| (3)                      | N <sub>2</sub>                    | not exceeding 2610  | Euro 6                                    | 0.28  | Type I                             |
| (4)                      | N <sub>1</sub> sub-class<br>(i)   | not exceeding 2610  | Euro 6                                    | 0.18  | Type I                             |
| (5)                      | N <sub>1</sub> sub-class<br>(ii)  | not exceeding 2610  | Euro 6                                    | 0.235   | Type I                             |
| (6)                      | N <sub>1</sub> sub-class<br>(iii) | not exceeding 2610  | Euro 6                                    | 0.28  | Type I                             |

TABLE 5 - EURO 4 STANDARDS FOR POSITIVE IGNITION CLASS M & N VEHICLES

| <i>(a)</i><br>Row<br>No. | <i>(b)</i><br>Class of<br>vehicle | <i>(c)</i><br>Reference mass of vehicle,<br>where relevant<br>(kilograms) | <i>(d)</i><br>EC<br>emissions<br>standard | <i>(e)</i><br>Limit values for<br>$NO_x$ (grams per<br>kilometre) | <i>(f)</i><br>Appropriate<br>tests |
|--------------------------|-----------------------------------|---|---|---|------------------------------------|
|--------------------------|-----------------------------------|---|---|---|------------------------------------|

|     |                                |                    |        |      |        |
|-----|--------------------------------|--------------------|--------|------|--------|
| (1) | M <sub>1</sub>                 | not exceeding 2610 | Euro 4 | 0.08 | Type 1 |
| (2) | N <sub>1</sub> sub-class (i)   | not exceeding 2610 | Euro 4 | 0.08 | Type 1 |
| (3) | N <sub>1</sub> sub-class (ii)  | not exceeding 2610 | Euro 4 | 0.10 | Type 1 |
| (4) | N <sub>1</sub> sub-class (iii) | not exceeding 2610 | Euro 4 | 0.11 | Type 1 |

TABLE 6 - EURO 3 STANDARDS FOR CLASS L VEHICLES

| (a)<br>Row No. | (b)<br>Class of vehicle                                   | (c)<br>Reference mass of vehicle, where relevant (kilograms) | (d)<br>EC emissions standard | (e)<br>Limit values for NO <sub>x</sub> (grams per kilometre) | (f)<br>Appropriate tests |
|----------------|---|--|------------------------------|---|--------------------------|
| (1)            | Class L (motorcycles)                                     |  | Euro 3(L)                    | 0.15  | Type 1                   |
| (2)            | Class L (compression ignition tricycles and quadricycles) |  | Euro 3(L)                    | 0.65  | Type 1                   |
| (3)            | Class L (positive ignition tricycles and quadricycles)    |  | Euro 3(L)                    | 0.4   | Type 1                   |

**3.**For the purposes of this Scheme—

- (a) “ambulances” has the meaning given in Annex II.A of Council Directive 70/156/EEC;
- (b) “chassis dynamometer test” means a test carried out by means of a chassis dynamometer using a test cycle that Transport for London is satisfied replicates so far as practicable the standard ETC test cycle;
- (c) “Class L (compression ignition tricycles and quadricycles)” comprises compression ignition vehicles falling within categories L5e, L6e and L7e as defined in Article 1 of Council Directive 2002/24/EC;
- (d) “Class L (motorcycles)” comprises vehicles falling within categories L1e, L2e, L3e and L4e as defined in Article 1 of Council Directive 2002/24/EC;
- (e) “Class L (positive ignition tricycles and quadricycles)” comprises positive ignition vehicles falling within categories L5e, L6e and L7e as defined in Article 1 of Council Directive 2002/24/EC;
- (f) “Class M<sub>1</sub>” comprises vehicles designed and constructed to have not more than eight seats in addition to the drivers seat and intended for the carriage of passengers;
- (g) “Class M<sub>2</sub>” comprises vehicles designed and constructed to have more than eight seats in addition to the drivers seat and intended for the carriage of passengers, and having a maximum mass not exceeding 5,000 kilograms;
- (h) “Class M<sub>3</sub>” comprises vehicles designed and constructed to have more than eight seats in addition to the drivers seat and intended for the carriage of passengers, and having a maximum mass exceeding 5,000 kilograms;

- (i) “Class N<sub>1</sub> sub-class (i)” comprises:
  - (i) ambulances and hearses having a maximum mass exceeding 2,500 kilograms and which, applying item 2 of Appendix 1, Annex XI, Council Directive 70/156/EEC, would be treated as ~~class~~Class N<sub>1</sub> sub-class (ii) vehicles for emissions purposes;
  - (ii) motor caravans having a maximum mass exceeding 2,500 kilograms; and
  - (iii) vehicles designed and constructed for the carriage of goods
 in each case having a reference mass not exceeding 1,305 and a maximum mass not exceeding 3,500 kilograms;
- (j) “Class N<sub>1</sub> sub-class (ii)” comprises:
  - (i) ambulances and hearses having a maximum mass exceeding 2,500 kilograms and which, applying item 2 of Appendix 1, Annex XI, Council Directive 70/156/EEC, would be treated as ~~class~~Class N<sub>1</sub> sub-class (ii) vehicles for emissions purposes;
  - (ii) motor caravans having a maximum mass exceeding 2,500 kilograms; and
  - (iii) vehicles designed and constructed for the carriage of goods
 in each case having a reference mass exceeding 1,305 kilograms but not exceeding 1,760 kilograms and a maximum mass not exceeding 3,500 kilograms;
- (k) “Class N<sub>1</sub> sub-class (iii)” comprises:
  - (i) ambulances and hearses having a maximum mass exceeding 2,500 kilograms and which, applying item 2 of Appendix 1, Annex XI, Council Directive 70/156/EEC, would be treated as ~~class~~Class N<sub>1</sub> sub-class (iii) vehicles for emissions purposes;
  - (ii) motor caravans having a maximum mass exceeding 2,500 kilograms; and
  - (iii) vehicles designed and constructed for the carriage of goods,
 in each case having a reference mass exceeding 1,760 kilograms and a maximum mass not exceeding 3,500 kilograms;
- (l) “Class N<sub>2</sub>” comprises:
  - (i) ambulances and hearses which, applying item 2 or item 41 of Appendix 1, Annex XI, Council Directive 70/156/EEC, would be treated as ~~class~~Class N<sub>2</sub> vehicles for emissions purposes;
  - (ii) motor caravans; and
  - (iii) vehicles designed and constructed for the carriage of goods,
 in each case having a maximum mass exceeding 3,500 kilograms but not exceeding 12,000 kilograms;
- (m) “Class N<sub>3</sub>” comprises:
  - (i) ambulances and hearses which, applying item 41 of Appendix 1, Annex XI, Council Directive 70/156/EEC, would be treated as ~~class~~Class N<sub>3</sub> vehicles for emissions purposes;
  - (ii) motor caravans; and
  - (iii) vehicles designed and constructed for the carriage of goods,
 in each case having a maximum mass exceeding 12,000 kilograms;
- (n) “ELR test” means a test as described in section 2.1 of Annex I to Council Directive 2005/55/EC to be applied in accordance with section 6.2 of that Annex;
- (o) “engine test bench ETC test” means a test as described in section 2.14 of Annex I to Council Directive 88/77/EEC and carried out using the procedure described in Appendices 2 and 3, Annex III of that Directive; and



- (p) “ESC test” means a test as described in section 2.12 of Annex I to Council Directive 88/77/EEC and carried out using the procedure described in Appendix 1, Annex III of that Directive;
- (q) “ETC test” means an engine test bench ETC test or a chassis dynamometer test;
- (r) “exhaust after-treatment system” means a system installed downstream of the engine of a vehicle for the purposes of reducing emissions of particulate matter, and operating by means of a particulate filter or trap, NO<sub>x</sub> catalyst system, or both;
- (s) “Euro 3” means the emissions limit values set out in the rows corresponding with Category A in the first of the tables at section 5.3.1.4 of Annex I to Council Directive 70/220/EEC;
- (t) “Euro 3(L)” means the emissions limit values (or where more than one limit value is specified in relation to a Class or Classes of vehicle, the lowest of the emissions limit values) set out in the fifth column of the table at section 1 of the Annex to Council Directive 2002/51/EC;
- (u) “Euro 4” means the emissions limit values set out in the rows corresponding with Category B in the first of the tables at section 5.3.1.4 of Annex I to Council Directive 70/220/EEC;
- (v) “Euro 6” means the emissions limit values set out in column L4 of Table 2 of Annex I to Commission Regulation 715/2007 of 20 June 2007 as amended;
- (w) “Euro III” means the emissions limit values set out in Row A of Table 1 and Table 2 of section 6.2.1 of Annex I to Council Directive 88/77/EEC;
- (x) “Euro IV” means the emissions limit values set out in Row B1 of Table 1 and Table 2 of section 6.2.1 of Annex I to Council Directive 88/77/EEC;
- (y) “Euro VI” means the emissions limit values set out in the sixth column of the table in Annex I to Commission Regulation 595/2009 of 18 June 2009 as amended;
- (z) “g/km” means grams per kilometre;
- (aa) “g/kWh” means grams per kilowatt-hour;
- (bb) “hearses” has the meaning given in Annex II.A of Council Directive 70/156/EEC;
- (cc) “maximum mass” in relation to a vehicle means the technically permissible maximum laden mass as specified by the manufacturer;
- (dd) “motor caravans” has the meaning given in Annex II.A of Council Directive 70/156/EEC;
- (ee) “reference mass” in relation to a vehicle means the mass of the vehicle with bodywork and, in the case of a towing vehicle, with coupling device, if fitted by the manufacturer, in running order, or mass of the chassis or chassis with cab, without bodywork and/or coupling device if the manufacturer does not fit the bodywork and/or coupling device (including liquids and tools, and spare wheel if fitted, and with the fuel tank filled to 90% and the other liquid containing systems, except those for used water, to 100% of the capacity specified by the manufacturer), increased by a uniform mass of 100 kilograms;
- (ff) “NO<sub>x</sub>” means oxides of nitrogen;
- (gg) “Type I test” means a test as described in section 5.3 of Annex I to Council Directive 70/220/EEC (test for simulating/verifying the average tailpipe emissions after a cold start) and carried out using the procedure described in Annex III of that Directive;
- (hh) “WHSC” means the World Harmonised Steady state Driving Cycle as defined in Regulation No. 49 of the Economic Commission for Europe of the United Nations.
- (ii) “WHTC” means the World Transient Steady state Driving cycle as defined in Regulation No. 49 of the Economic Commission for Europe of the United Nations.”.

**Transitional Provisions – resident’s vehicles [and certain disabled vehicles](#)**

**18.** The Annex to this Variation Scheme has effect in relation to resident’s vehicles [and certain disabled vehicles](#).

## TRANSITIONAL PROVISIONS

**Resident's vehicles liability for ULEZ charge**

1.—(1) During the residents' transitional period Transport for London shall treat any vehicle that is—

- (a) liable to pay a charge imposed by article 7(2); and
- (b) a qualifying resident's vehicle,

as if it were a non-chargeable vehicle for the purposes of the LEZ Scheme in respect of charges imposed by article 7(2).

(2) In this paragraph—

- (a) "residents' transitional period" means the period beginning with 7 September 2020 and ending on 6 September 2023;
- (b) "qualifying resident's vehicle" means a vehicle—
  - (i) that is a resident's vehicle within the meaning of paragraph 2 of Annex 3 of the Principal Scheme; and
  - (ii) particulars of which appear in the register.

**Certain disabled vehicles liability for ULEZ charge**

2.—(1) During the disabled vehicles transitional period Transport for London shall treat any vehicle that is—

- (a) liable to pay a charge imposed by article 7(2);
- (b) a disabled vehicle; and
- (c) not operated by or on behalf of Transport for London,

as if it were a non-chargeable vehicle for the purposes of the LEZ Scheme in respect of charges imposed by article 7(2).

(2) In this paragraph—

- (a) "disabled vehicles transitional period" means the period beginning with 7 September 2020 and ending on 6 September 2023;
- (b) "registered in the GB records" in relation to a vehicle means that the vehicle is registered under section 21 of the 1994 Act in that part of the register (as defined by section 62(1) of that Act) which is maintained on behalf of the Secretary of State by the Driver and Vehicle Licensing Agency;
- (c) "registered in the NI records" in relation to a vehicle means that the vehicle is registered under section 21 of the 1994 Act in that part of the register (as defined by section 62(1) of that Act) which is maintained on behalf of the Secretary of State by Driver and Vehicle Licensing Northern Ireland;

(3) A "disabled vehicle" is a vehicle that is —

- (a) a vehicle registered in the GB or NI records and falling within paragraphs 18, 19 or 20 of Schedule 2 to the 1994 Act; or
- (b) a vehicle registered under legislation relating to the registration of vehicles in a member State in respect of which Transport for London is satisfied that, had the vehicle been registered under

the 1994 Act, it would have been an exempt vehicle under paragraph 18 or 20 of Schedule 2 to that Act had it been registered under that Act.

## **Appendix B: List of stakeholders that responded to the ULEZ consultation**

1. 680&MO Club
2. Addison Lee
3. Age UK London
4. Air Training Corps
5. Alliance of British Drivers
6. Asthma UK
7. Autogas
8. Automobile Association
9. Baker Street Quarter Partnership
10. Belgravia Residents Association
11. Better Bankside
12. British Heart Foundation
13. British Motorcycle Federation
14. BVRLA
15. Cab Drivers Newspaper
16. Camden Cyclists
17. Camden Green Party
18. Campaign for Air Pollution Public Inquiry
19. Campaign for Better Transport
20. City of London corporation
21. Clear Air in London
22. Client Earth
23. Confederation of Passenger Transport
24. Crown Estate
25. Disabled Motoring UK
26. Energy Saving Trust
27. Environmental Industries Commission
28. Federation of British Historic Vehicle Clubs
29. Federation of Small Businesses
30. First Group plc.
31. Fitzrovia Partnership BID
32. Ford Motor Company Ltd

33. Freight Transport Association
34. Friends of the Earth
35. General Motors UK Ltd
36. GMB Professional Drivers Branch
37. Golden Tours (Transport) Ltd
38. Guide Dogs
39. Heart of London Business Alliance
40. I Like Clean Air
41. Inmidtown Business Improvement District
42. Institute of Professional Drivers and Chauffeurs
43. Islington Green Party
44. Jaguar Land Rover
45. Jenny Jones AM
46. The Little Bus Company
47. Environmental Audit Committee
48. Joint Committee on Mobility for Disabled People
49. Jon Cruddas MP
50. Lambeth Green Party
51. LB Barking and Dagenham
52. LB Brent
53. LB Camden
54. LB Enfield
55. LB Hackney
56. LB Hammersmith and Fulham
57. LB Haringey
58. LB Islington
59. LB Lambeth
60. LB Lambeth and Southwark Public Health Team
61. LB Lewisham
62. LB Merton
63. LB Newham
64. LB Richmond-Upon-Thames
65. LB Southwark
66. LB Sutton
67. LB Tower Hamlets

68. LB Waltham Forest
69. LB Wandsworth
70. LBs Hackney, Camden, Lambeth and Southwark
71. Licensed Private Hire Car Association
72. Licenced Taxi Drivers Association
73. Living Streets
74. London Assembly
75. London Assembly Labour Group
76. London Assembly Liberal Democrat Group
77. London Borough of Redbridge
78. London Cab Drivers Club
79. London Chamber of Commerce and Industry
80. London Councils'
81. London Cycling Campaign
82. London Duck Tours
83. London Fire Brigade
84. London Forum of Amenity and Civic Societies
85. London Motor Cab Proprietors Association
86. London Pedicabs Operators Association
87. London Sustainability Exchange
88. London Taxi Company
89. London Tourist Coach Operators' Association
90. London TravelWatch
91. London's Clinical Commissioning Groups
92. LT Museum
93. Metropolitan Police
94. Motorcycle Action Group
95. Motorcycle Industry Association
96. National Franchised Dealers Association
97. New West End Company
98. Network for Clean Air
99. NHS England
100. NHS Southwark, CCG
101. Original London Sightseeing Tour Ltd
102. Private Hire Board

103. Public Health England
104. RAC Foundation
105. RAC Motoring Services
106. RB Greenwich
107. RB Kensington & Chelsea
108. Richmond Park Liberal Democrats
109. Sainsburys
110. SMMT
111. Southwark Living Streets
112. Sustrans
113. Toyota
114. Transport Watch
115. Uber
116. UK Health Forum
117. UK Hydrogen and Fuel Cell Association
118. UKLPG
119. Unite the Union
120. United Cabbies Group
121. UPS
122. Westminster City Council
123. Westminster Living Streets



## **Appendix C: List of stakeholders invited to respond to the ULEZ consultation**

1. 31 Budge Lane
2. AA
3. Abellio
4. Abellio West London Ltd t/a Abellio Surrey
5. Action autism - LB Islington
6. Action Disability Kensington & Chelsea
7. Action for Blind People
8. Action for Kids
9. Action on Disability and Work UK
10. Action on Hearing Loss (RNID)
11. Active Plus
12. Addison Lee
13. Advocacy in Greenwich
14. Advocacy Project
15. Age UK Barnet
16. Age UK Bexley
17. Age UK Brent
18. Age UK Bromley & Greenwich
19. Age UK Camden
20. Age UK Croydon
21. Age UK Ealing
22. Age UK Enfield
23. Age UK Hammersmith and Fulham
24. Age UK Haringey
25. Age UK Harrow
26. Age UK Havering
27. Age UK Hillingdon
28. Age UK Islington
29. Age UK Kensington & Chelsea
30. Age UK Kingston upon Thames
31. Age UK Lambeth
32. Age UK Lewisham and Southwark
33. Age UK London
34. Age UK Merton
35. Age UK Redbridge
36. Age UK Richmond upon Thames
37. Age UK Sutton
38. Age UK Waltham Forest
39. Age UK Wandsworth
40. Age UK Westminster
41. Air Quality Consultants
42. Alliance of British Drivers
43. Allied Vehicles

44. Alzheimer's Society
45. Amber Coaches Ltd
46. Anderson Travel Ltd
47. Angel AIM
48. Ann Frye
49. Arriva Kent Thameside/Kent & Sussex, Arriva Guildford & West Sussex
50. Arriva London
51. Arriva London North Ltd
52. Arriva the Shires
53. Arriva The Shires/ East Herts and Essex
54. Arthritis Care
55. Artsline
56. Ashcroft Support
57. Asian People's Disability Alliance
58. Aspire
59. Association of British Drivers
60. Association of Disabled Professionals
61. Asthma UK
62. Atbus
63. ATCoaches Ltd t/a Abbey Travel
64. Attitude is Everything
65. Baker Street Quarter BID
66. Barking & Dagenham careers
67. Barking Havering and Redbridge University Hospitals NHS Trust
68. Barnet and Chase Farm Hospitals NHS Trust
69. Barnet Carers
70. Barnet Centre for Independent Living
71. Barnet CIL
72. Barnet, Enfield and Haringey Mental Health NHS Trust
73. Barts Health NHS Trust
74. Bayliss Executive Travel Ltd
75. Bayswater BID
76. BB Afternoon Tea
77. BETC Ltd t/a Buses Excetera
78. Better Bankside BID
79. Bexley Accessible Transport Scheme
80. Bexley Association of Disabled people
81. Biz Bus Ltd
82. Black Disabled Peoples Association
83. Blesma
84. Blind Veterans
85. Brent Association of Disabled People
86. Brentwood Community Transport
87. Brewing, Food, Beverage Industry Supplies
88. Brimsdown Freight Quality Partnership
89. British Deaf Association (BDA)

90. British Heart Foundation
91. British Lung Foundation
92. British Motorcyclists Federation
93. British Retail Consortium
94. Bromley Association of People with Disabilities
95. Bromley Deaf Access
96. Bromley Experts by Experience
97. Brookline Coaches t/a Brookline Coaches Ltd
98. Bureau Veritas
99. Business B Ltd t/a The Expeditional
100. Business Disability Forum
101. Business in the Community
102. Buzzlines
103. BVRLA
104. Camden and Islington NHS Foundation Trust
105. Camden Carers
106. Camden People First
107. Camden Town Unlimited
108. Campaign for Better Transport
109. Campaign for Clean Air in London
110. Canary Wharf Group
111. Carbon Trust
112. Carers Bromley
113. Carers Support Bexley
114. Carousel Buses Ltd
115. CarPlus
116. Centaur Overland Travel Ltd
117. Central London Community Healthcare NHS Trust
118. Central London Forward
119. Central London Freight Quality Partnership
120. Certitude
121. Chalkwell Garage & Coach Hire Ltd
122. Chartered Society of Physiotherapy
123. Chauffeur & Executive Association
124. Chelsea and Westminster Hospital NHS Foundation Trust
125. Children's Society
126. Chiltern Disability Focus Group
127. CHOICE in Hackney
128. Christiane Link
129. Citizen's Advice
130. City of London
131. City of London Access Group
132. City of London Equality Officer
133. City of London Police
134. City of Westminster
135. Client Earth

136. CNWL Mental Health NHS Trust
137. Cobra Corporate Services Ltd
138. CommUNITY Barnet
139. Community Transport Association
140. Confederation of Business Industry
141. Confederation of Passenger Transport
142. Connect
143. Contact a Family
144. Crossriver Partnership
145. Croydon - People First
146. Croydon Coaches (UK) Ltd t/a Coaches Excetera
147. Croydon Coalition for Independent Living and Learning
148. Croydon Health Services NHS Trust
149. Croydon Mobility Forum
150. Croydon North
151. Croydon People First
152. CT Plus
153. CT Plus Ltd t/a Hackney Community Transport
154. DABD
155. DASH
156. Deaf Drop In
157. Deaf Ethnic Minority Women's Organisation
158. Deaf Parents Deaf Children
159. DeafPlus
160. DECC
161. DEFRA
162. DEFRA/House of Commons
163. Department for Business, Innovation and Skills
164. Department for Communities and Local Government
165. Department for Transport
166. DHL
167. DIAL Havering
168. DIAL Waltham Forest
169. Disability Action in the Borough of Barnet (DAbB)
170. Disability Action Waltham Forest
171. Disability Advice Service Lambeth (DASL)
172. Disability Advocacy Network/Disability Coalition Tower Hamlets
173. Disability Coalition Tower Hamlets
174. Disability Croydon
175. Disability in Camden (DISC)
176. Disability Law Service
177. Disability Network Hounslow
178. Disability Rights UK
179. Disabled Go
180. Disablement Association of Barking and Dagenham (DABD)
181. Disablement Association Hillingdon (DASH)

182. DPAC
183. E Clarke & Son (Coaches) Ltd, t/a Clarkes of London
184. E.S.S.A
185. Ealing Carers
186. Ealing Centre for Independent Living
187. Ealing Help
188. Ealing Hospital NHS Trust
189. East London NHS Foundation Trust
190. East Surrey Rural Transport Partnership t/a Polestar Travel
191. Easybus
192. Ebdons Tours
193. Element Energy
194. Energy Saving Trust
195. Enfield Disability Action
196. Ensign Bus Company Ltd
197. Environment Agency
198. Environmental Protection UK
199. Epsom and St Helier University Hospitals NHS Trust
200. Equalities National Council
201. Equality Streets
202. Equals Training CIC
203. Equals Voice
204. ETOA
205. Eurolines
206. Federation of British Historic Vehicles
207. Federation of Small Businesses
208. Fire Brigade
209. First Beeline Buses Ltd
210. Fitzrovia Partnership
211. Fraser Nash
212. Freight Transport Association
213. Friends of Capital Transport
214. Friends of the Earth
215. G4S Cash Solution
216. Garratt Business Park
217. Gatwick Airport
218. Gatwick Flyer Ltd
219. GMB
220. Gnewt Cargo Ltd
221. Go Ahead London
222. Go-Coach Hire Ltd
223. Golden Tours (Transport) Ltd
224. Great Ormond Street Hospital
225. Greater London Forum for Older People
226. Greenpeace UK
227. Greenwich Association of Disabled People

228. Greenwich Carers
229. Greenwich Pensioners Forum
230. Guy's and St Thomas' NHS Foundation Trust
231. H&F Disability Forum
232. Hackney Carers
233. Hackney People First Big Group meeting
234. Hainault Business Park
235. Hammersmith and Fulham Action on Disability (HAFAD)
236. Hammersmith and Fulham Older People's Consultative Forum
237. Hammersmith Hospitals NHS Trust
238. Haringey Consortium of Disabled People and Carers (HCDC)
239. Haringey Mobility Forum
240. Harrow Association of Disabled People
241. Harrow Carers
242. Harrow Macular Disease Society
243. Harrow Over 50s Club
244. Harrow Public Transport Users Association
245. HAUC - Utilities
246. Havering Association for People with Disabilities
247. Hear Us
248. Heart of London Business Alliance
249. Hillingdon Access & Mobility Forum
250. Hillingdon Carers
251. Hillingdon Hospital NHS Trust
252. Hillingdon Mobility Forum
253. Homerton University Hospital NHS Foundation Trust
254. Hounslow and Richmond Community Healthcare NHS Trust
255. Hounslow Mobility Forum
256. House of Commons
257. HR Richmond Ltd t/a Quality Line
258. IDAG
259. iDBus
260. Impact
261. Imperial College
262. Imperial College Healthcare NHS Trust
263. Inclusion London
264. InMidtown BID
265. Institute of Advanced Motorists
266. Interactive UK
267. Iranian Disability Support Association
268. Islington Mobility Forum
269. J Brierley & E Barvela t/a Snowdrop Coaches
270. Jayel Projects
271. Jeremy Reese t/a The Little Bus Company
272. Jigsaw
273. John Lewis

274. Joint Committee on Mobility for Disabled People (JCMD)
275. Karsan
276. Kensington & Chelsea Mobility Forum
277. Khan Wali Khan t/a Redline Buses
278. King's College Hospital NHS Foundation Trust
279. Kings College London
280. Kingston Centre for Independent Living
281. Kingston Hospital NHS Trust
282. Kingston Mobility Forum
283. Lambeth Learning Disability forum
284. LARM
285. LCVP
286. Learning Disability Coalition
287. Leeds University
288. Leonard Cheshire Disability
289. Lewisham & Greenwich NHS Trust
290. Lewisham Disability Coalition
291. Lewisham Speaking Up
292. Licensed Cab Drivers Club
293. Licensed Private Hire Car Association (LPHCA)
294. Licensed Taxi Drivers Association
295. LIVF
296. Living Streets
297. London Ambulance Service
298. London Ambulance Service NHS Trust
299. London Assembly Environment Committee
300. London Autistic Rights Movement
301. London Borough of Barking & Dagenham
302. London Borough of Barnet
303. London Borough of Bexley
304. London Borough of Brent
305. London Borough of Bromley
306. London Borough of Camden
307. London Borough of Croydon
308. London Borough of Ealing
309. London Borough of Enfield
310. London Borough of Hackney
311. London Borough of Hammersmith & Fulham
312. London Borough of Haringey
313. London Borough of Harrow
314. London Borough of Havering
315. London Borough of Hillingdon
316. London Borough of Hounslow
317. London Borough of Islington
318. London Borough of Lambeth
319. London Borough of Lewisham

320. London Borough of Merton
321. London Borough of Newham
322. London Borough of Redbridge
323. London Borough of Richmond-Upon-Thames
324. London Borough of Southwark
325. London Borough of Sutton
326. London Borough of Tower Hamlets
327. London Borough of Waltham Forest
328. London Borough of Wandsworth
329. London Chamber of Commerce and Industry (LCCI)
330. London Councils
331. London Cycling Campaign
332. London Duck Tours Ltd
333. London Electric Vehicle Partnership
334. London First
335. London General Transport Services LtdN
336. London Hydrogen Partnership
337. London Mencap
338. London Older People's Strategy Group
339. London Private Hire Board
340. London Riverside BID
341. London Service Voluntary Council
342. London Sovereign
343. London Strategic Forum (was CTA)
344. London Taxi Company (LTC)
345. London TravelWatch
346. London United
347. London United Busways Ltd
348. London Visual Impairment Forum
349. London Voluntary Service Council
350. Low Carbon Vehicle Partnership
351. LSVC
352. Marshalls Coaches
353. Megabus London
354. Mencap
355. Mercedes
356. Merton Carers
357. Merton Centre for Independent Living
358. Merton Mind
359. Merton Transport Group
360. Metrobus Ltd
361. Metropolitan / City Police
362. Metropolitan Police service
363. Moorfields Eye Hospital NHS Foundation Trust
364. Motorcycle Action Group
365. MS Society



366. Mullany's Coaches
367. National Association of Funeral Directors
368. National Association of Wedding Car Professionals
369. National Autistic Society
370. National Council of Voluntary Organisations
371. National Express Ltd
372. National Pensioners Convention
373. National Performance Advisory Group (NHS)
374. Natural England
375. NCVO
376. New West End Company BID
377. Newham Disability Forum
378. Newham Ethnic Minority Disability Alliance
379. Newham People First
380. Newham Transport Action Group
381. Next Green and Ecolane Consultancy
382. NHS
383. NHS Barking and Dagenham CCG
384. NHS Barnet CCG
385. NHS Bexley CCG
386. NHS Brent CCG
387. NHS Bromley CCG
388. NHS Camden CCG
389. NHS Central London CCG (Westminster)
390. NHS City and Hackney CCG
391. NHS Croydon CCG
392. NHS Ealing CCG
393. NHS East London (Includes City and Hackney, Newham and Tower Hamlets)
394. NHS Enfield CCG
395. NHS Greenwich CCG
396. NHS Hammersmith and Fulham CCG
397. NHS Haringey CCG
398. NHS Harrow CCG
399. NHS Havering CCG
400. NHS Hillingdon CCG
401. NHS Hounslow CCG
402. NHS Islington CCG
403. NHS Kingston CCG
404. NHS Lambeth CCG
405. NHS Lewisham CCG
406. NHS Merton CCG
407. NHS Newham CCG
408. NHS North Central London (Includes Enfield, Camden, Barnet, Haringey, Islington)
409. NHS Northwest London (Includes Brent, Ealing, Harrow, Hammersmith and Fulham, Hounslow, Hillingdon, Kensington and Chelsea and Westminster)

410. NHS Richmond CCG
411. NHS South East London (Includes Bexley, Bromley, Greenwich, Lambeth, Lewisham, Southwark)
412. NHS Southwark CCG
413. NHS Southwest (Includes Croydon, Wandsworth, Merton , Richmond, Kingston and Sutton)
414. NHS Sutton CCG
415. NHS Tower Hamlets CCG
416. NHS Waltham Forest CCG
417. NHS Wandsworth CCG
418. Nissan
419. NJUG
420. North African Disabled People's Association
421. North East London NHS Foundation Trust (Includes Barking and Dagenham, Havering, Waltham Forest and Redbridge)
422. North Middlesex University Hospital
423. Northbank BID
424. Office for Low Emission Vehicles
425. OFJ Connections Ltd
426. Olympus Bus & Coach Company t/a Olympian Coaches
427. One80
428. Organisation of Blind African Caribbeans
429. Oxford Tube (Thames Transit)
430. Oxleas NHS Foundation Trust
431. Paddington BID
432. Penzo
433. People First Lambeth
434. People First Ltd
435. Policy Exchange
436. Positively Women / Positively UK
437. Premium Coaches Ltd
438. Purple Parking Ltd
439. Quality Line
440. R Hearn t/a Hearn's Coaches
441. RAC
442. RADAR (London Access Forum)
443. RAF Benevolent Fund
444. RBKC International Women's day event
445. Reach out East
446. Real
447. Real (Tower Hamlets)
448. Red Eagle
449. Red Rose Travel, Ltd
450. Redbridge Carers
451. Redbridge Carers Information Day
452. Redbridge Concern for Mental Health
453. Redbridge Disability Association

454. Redbridge People First
455. Redwing Coaches (Pullmanor Ltd)
456. Regard
457. Reliance Travel
458. Remploy
459. Remploy Waterloo
460. Reynolds Coaches
461. Reynolds Diplomat Coaches
462. Richmond Access Forum
463. Richmond Advice and Information on Disability
464. Richmond upon Thames Mobility Forum
465. Richmond User Independent Living Scheme (RUILS)
466. RLSB
467. RNIB
468. Road Haulage Association Ltd
469. Road Haulage Association Southern & Eastern Region
470. Rowan Public Affairs
471. Royal Borough of Greenwich
472. Royal Borough of Kensington & Chelsea
473. Royal Borough of Kingston Upon Thames
474. Royal Brompton & Harefield NHS Foundation Trust
475. Royal Free London NHS Foundation Trust
476. Royal Hospital for Neurodisability
477. Royal London Society for Blind People
478. Royal Mail
479. Royal Marsden NHS Foundation Trust
480. Royal National Orthopaedic Hospital NHS Trust
481. Scope
482. See-London.co.uk Ltd t/a See London By Night
483. SEN Merton
484. Social Action Radio
485. South London and Maudsley NHS Foundation Trust
486. South London Freight Quality Partnership
487. South London Tamil Welfare Group
488. South West London and St George's Mental Health NHS Trust
489. Southdown PSV Ltd
490. Southgate & Finchley Coaches Ltd
491. Southwark Carers
492. Southwark Centre for Independent Living
493. Southwark Disablement Association
494. Southwark Independent Living Centre
495. Speak Out in Hounslow
496. Spear London
497. Sport England
498. St George's Healthcare NHS Trust
499. St John Ambulance London (Prince of Wales's) District

500. Stagecoach
501. Stay Safe East
502. Sullivan Bus and Coach Ltd
503. Sustrans
504. Sutton Alliance of Disabled People
505. Sutton Carers
506. Sutton Centre for Independent Living and Learning
507. Sutton Mobility Forum
508. Tavistock and Portman NHS Foundation Trust, The
509. Team London Bridge
510. Terravision Transport Ltd
511. TGM Group Ltd
512. The Association of Guide Dogs for the Blind
513. The Big Bus Company Ltd t/a Big Bus Tours
514. The Camden Society
515. The Centre for Independent and Inclusive Living
516. The City of Oxford Motor Services Ltd
517. The Disability Foundation
518. The Ghost Bus Tours Ltd
519. The Heathway Centre
520. The Kings Ferry Ltd
521. The Original London Sightseeing Tour Ltd.
522. The Showmans Guild of GB (circus)
523. The Society of Motor Manufacturers & Traders (SMMT)
524. Thomas Pocklington Trust
525. Thomas's London Day Schools (Transport) Ltd
526. TNT
527. Tower Hamlets Mobility Forum
528. Tower Transit Operations Ltd
529. Transport and the Environment
530. Transport for All
531. Travel Mentor - Carers Information Service - Croydon
532. Travel Mentor - Childrens Society
533. Travel Mentor - Croydon
534. Travel Mentor - DLR
535. Travel Mentor - Home to School Transport - Southwark
536. Travel Mentor - HTC
537. Travel Mentor - Markfield
538. Travel Mentor - Mencap - Ealing
539. Travel Mentor - Travel Training
540. Travel Mentor - Westminster
541. Travel Mentor - Without Walls - Lambeth
542. TRL
543. UCL (sustainable transport specialist)
544. UKDPC
545. UKPIA

546. Unite the Union
547. University College London Hospitals NHS Foundation Trust
548. Universitybus Ltd t/a uno
549. UNO Buses
550. Urban Design
551. Vauxhall One
552. Victoria BID
553. Viridor Waste
554. Vision 2020
555. Waltham Forest Disability Resource Centre
556. Waltham Forest Mobility Forum
557. Wandsworth Cycling Campaign
558. Wandsworth Mobility Forum
559. Wandsworth Older People's Forum
560. Wandsworth Carers
561. Waterloo Quarter Business Alliance BID
562. West London Alliance
563. West London CCG (K&C)
564. West London Mental Health NHS Trust
565. West Middlesex University Hospital NHS Trust
566. Westminster (freight specialist)
567. Westminster Society
568. Whittington Hospital NHS Trust, The
569. Whizz-Kidz
570. Willow Lane BID
571. Wish
572. Wish London
573. World Autism Day
574. Zipcar

## **Appendix D: Summaries of Stakeholder Responses**

### **Bus & Coach Operators**

#### **FirstGroup plc.**

FirstGroup considers it very important to tackle poor air quality in central London and strongly supports the ULEZ proposals, however opposes the residents' discount. It notes that the charges for buses and coaches are disproportionately high compared with the proposals for cars and vans, particularly given the average number of occupants of such vehicles. It also urges TfL to work with vehicle manufacturers to develop more efficient and cheaper solutions to meeting the Euro 6 standards and requests assurance from TfL that its non-compliant vehicles will not be charged if they have to enter the zone due to traffic diversions as they normally do not operate within the proposed zone.

#### **Golden Tours**

Golden Tours agrees that air quality in London needs to be improved. It states that the proposals will have a negative impact on the coach industry. It does not believe that retrofitting options will be available. It states that the lifespan of coaches can be up to 25 years which will mean that under ULEZ; operators will need to replace their vehicles much earlier than anticipated. This will have a negative financial impact on the industry. It requests that TfL considers providing a sunset period for the coach industry similarly to what is being proposed for residents.

#### **London Tourist Coach Operators Association (LTCOA)**

The London Tourist Coach Operators Association neither supports nor opposes the ULEZ although it recognises the need to improve air quality. It sets out the positive impacts of the coach trade on the London economy and states that the current proposals will lead to a reduction in the number of coaches able to bring people to the Capital. It notes that Euro VI coaches are new and expensive and there will be a limited second hand market for operators to buy from; it also states that there will be a collapse in the value of non-Euro VI coaches. It argues that, although retrofit solutions are in development, they are not yet available and many types of retrofit will be needed in order to equip different models of coach. It states that it is unfair to allow Euro V taxis and buses to operate without charge but require coaches to meet Euro VI. It calls for financial support for operators needing to upgrade vehicles and funding for retrofit development.

#### **The Little Bus Company**

The Little Bus Company strongly opposes ULEZ with concerns about the cost of implementation; in particular the cost of upgrading a fleet of 22 coaches to meet ULEZ standards.

## **The Original London Sightseeing Tour Ltd**

The Original London Sightseeing Tour company generally supports the overarching principle of the proposals however considers that they should be reconsidered as in their current state will impact the coach industry due to the lack of an after-market for open-top vehicles and the significant costs of achieving compliance through converting vehicles or purchasing new vehicles and scrapping large numbers of good working vehicles well within their life cycle. It also notes the associated environmental impacts of this. It adds that this would have subsequent impacts on London's economy, on tourism in London, in the West End and London theatres with a reduction in day trip coaches to London and open-top sightseeing coaches. It also considers that as well as the high costs to be borne by private enterprise, the implementation date of the proposals is too soon.

## **Businesses**

### **Autogas**

Autogas Ltd is supportive of the scheme generally but is mainly concerned with the reduction in the age limit proposed for taxis. It notes that when the age limit for taxis was first introduced, there was a 5-year 'exemption' for taxis converted to run on LPG. It states that this extension should be continued and notes that newer taxis have not delivered on emission reductions. It also states that investment in infrastructure has not kept pace with the ambition for electric vehicle take-up.

### **Ford Motor Company Limited**

Ford supports TfL's ambition to improve air quality and supports the ULEZ proposals. It however strongly suggests that petrol cars should also have a Euro 6 standard instead of Euro 4.

Ford also expressed concern that negative coverage of dirtier diesel engines will turn people away from diesel vehicles, undermining the market for these, of which they are a major manufacturer. It suggests the taxi fleet should meet current PHV standards and it opposes the proposed residents' exemption period. It also suggests supplementary measures should also be considered such as traffic demand measures.

### **General Motors UK**

General Motors UK supports the ULEZ proposals overall except for the ZEC requirements for taxis and PHVs which it opposes. It suggests that the Euro 6 standard should not only apply to diesel but should be set for petrol vehicles as well. It also suggests an investigation into better use of portable emission meters across

the capital to identify the biggest problem intersections and also into speed-camera equipment to penalise vehicles speeding away at traffic lights.

### **Jaguar Land Rover**

Jaguar Land Rover supports London action to tackle air quality. Jaguar Land Rover states that by 2020 all vehicles should have the Euro 6 requirement. Jaguar Land Rover believes that uplifting the petrol requirement to Euro 6 will prevent emissions degradation from older petrol vehicles. Zero Emission Capable requirements should match the Office for Low Emission Vehicles requirement. Future tightening of standards should be clearly set out with 5 year lead time (2025 changes made clear in 2020). Jaguar Land Rover is happy to share expertise.

### **London Duck Tours**

London Duck Tours vehicles will fall within the historic vehicle category and therefore will not be directly affected by ULEZ. However, it believes that there will be issues with new amphibious vehicles conforming to ULEZ criteria

### **Sainsbury's**

Sainsbury's states that it is prepared for the ULEZ, as the company vehicles are at Euro VI standard which it understands to be the criteria for the ULEZ and is confident that London businesses will follow suit. Sainsbury's accepts charging but is concerned that varying sets of rules may cause confusion and would prefer that commercial vehicles comply with fixed rules.

### **Toyota**

Toyota recognises the need for TfL to set important air quality and emission targets in London. However, Toyota is concerned about the proposal being based on Euro 4 and Euro 6 diesel standards as this may be misunderstood by the general public, as well as set a precedent to align to differing Euro standards in the future which is not in line with a technology neutral approach. Toyota suggest that TfL consider adopting an approach based on a single set of concrete PM and NO<sub>x</sub> levels rather than Euro standards.

## **Business Representative Organisations**

### **Baker Street Quarter Partnership BID**

Baker Street BID supports the ULEZ and notes that while there may be short-term costs to business in compliance, it is more important to them to start improving air quality, especially given the BID's proximity to Marylebone Road, which it would like fully included in the scheme. It suggests there may be a case for an exemption for operators seeking to reduce emissions in other ways, for example freight consolidation, and questions whether the charge for lighter vehicles will constitute a deterrent. It suggests the standards for taxis and PHVs could be introduced sooner.



## **Better Bankside**

Better Bankside supports the ULEZ and states that improved air quality will have competitiveness benefits to the London economy as well as improve quality of life. It is also supportive of future strengthening of standards and notes the extensive work it has done to improve air quality in its own operations, for example in trialling electric freight vehicles.

## **Federation of Small Businesses (FSB)**

The FSB supports the principle of improving air quality and removing from the roads those vehicles which contribute disproportionately to air pollution however it is concerned about the cost impacts of the proposals on small businesses including on the taxi and PHV sector. It notes that certain trades do not have the option to use public transport but require the use of a vehicle which is fundamental to their business. It also advocates policy changes including providing a monetary incentive scheme to assist individuals to change their vehicles, and that a 6 month grace period is granted for businesses entering the zone where they will not be charged however receive communications giving them a period of grace to retrofit or change their vehicle. It lastly suggests that further study should be undertaken to assess whether a new and improved road charging system could be more sophisticated and better reflect journey and emission patterns.

## **Fitzrovia Partnership BID**

The Fitzrovia Partnership BID supports the ULEZ however considers that the zone should be larger and that the proposed charge level is too low for some vehicles but too high for motorcycles. Although it supports the ZEC requirement for taxis and PHVs it opposes the other Taxi and Private Hire proposals as well as the proposed residents' three year exemption. It would like to see a zero emission zone implemented following the ULEZ. It also requests stricter targets by 2020 in terms of innovation in technology for vehicles other than just the TPH sector.

## **Heart of London Business Alliance**

The Heart of London Business Alliance recognises the importance of improving air quality in London and supports the ULEZ proposals. It suggests other measures could be considered for example, The Crown Estate's Urban Consolidation Scheme and a new Preferred Supplier Schemes for improved co-ordination of recycling and waste vehicles and better timing of goods deliveries outside traditional delivery hours wherever feasible.

## **InMidTown BID**

InMidTown BID supports the introduction of a ULEZ, agreeing with the proposed charges for light vehicles but stating that these should be higher for HGVs, coaches

and vans. It supports the proposed standards for TfL buses, taxis and PHVs and would support both an expansion of the zone and tightened standards in the future.

### **London Chamber of Commerce and Industry (LCCI)**

The London Chamber of Commerce and Industry supports ULEZ in principle and states that 2020 is the right date and must not be brought forward. Its main concern is businesses' readiness for the implementation: there must be sufficient information on how to comply and TfL must ensure that businesses can cope with the costs. It calls for TfL to focus on the traffic that causes most pollution, for example TfL buses, and asks how the upgrades will be funded. LCCI states that TfL and OLEV must work together to ensure that businesses can prepare for and comply with the ULEZ.

### **London Pedicab Operators Club**

The London Pedicab operators club believe that proposals will have a positive impact on air quality in London.

### **National Franchised Dealers Association (NFDA)**

The NFDA is in support of creating an Ultra Low emission zone and supports the need to do so. However, the NFDA requests a gradual implementation with careful consideration of the businesses residing within the ULEZ and the harsh penalties that will be impressed on them. The standard must be reflective of current technology and not develop beyond the capabilities of standard vehicles. The NFDA requests a 12 month transitional period where vehicles are warned and not fined after a first time breach and are advised of breaches to educate drivers as during implementation of LEZ in 2012.

### **New West End Company**

The New West End Company welcomes a scheme like ULEZ to tackle the air quality problems in London which affects both health and the environment. It believes that the scheme would be more advantageous if it was brought forward before 2020 and suggest a pilot scheme or mini-ULEZ in Oxford Street.

### **UKLPG**

UK Liquid Petroleum Gas industry supports the efforts of London to reduce air pollution from vehicles. However, it is disappointed that the proposal seeks to remove age related concessions granted to LPG taxis despite LPG bringing air quality benefits. UKLPG understands the desire of London to move forward with new technology, but replacing conventionally fuelled vehicles with electric powered vehicles simply shifts the pollution to other parts of the UK where electricity is produced.

## **Campaign Groups**

### **Campaign for Better Transport**

Campaign for Better Transport recognises the important of tackling poor air quality in London and even though it does not specifically indicate support or opposition to the ULEZ, it does state that it strongly supports the proposal that non-compliant vehicles must pay a charge to enter the zone although considers the charges too high for some vehicles classes. It also suggests the zone should be larger and that the proposed date of 2018 for ZEC PHVs and taxis could be achieved earlier even though it indicates general support for the bus and taxi proposals.

### **Campaign for Air Pollution Public Inquiry**

The Campaign for Air Pollution Public Inquiry recognises the importance of tackling poor air quality in London however opposes the ULEZ and all of its proposals except the proposal that non-compliant vehicles must pay a charge to enter the zone. It also considers that the London Taxi Age Limit is unlawful and should be suspended and consequently calls for full independent investigations into the age limit, of the Mayor of London and TfL, and of the London Taxi Drivers Association. It suggests that newer taxis are more polluting than older ones and suggests alternate policy options including looking at alternative fuels including clean diesel and biodiesel, improving traffic management and banning peak time deliveries.

### **Clean Air in London (CAL)**

Clean Air in London is supportive of a ULEZ in principle but considers that the proposed scheme is unambitious: it must be bigger and have higher standards in order to effectively address the problem of air pollution. It cites the increasing evidence of adverse effects of vehicle pollution on human health and the continued and recent of EU legal limit values in London. CAL states that a ban on diesels is required in order to realise sufficient benefits in London. It states that a primary ULEZ should ban all 4-year old diesel and all 10-year old petrol vehicles from an area bounded by the North and South circular by early 2018 and all diesels should be banned in high-pollution areas by January 2020.

### **Client Earth**

Client Earth states that the Mayor, like the UK Government, has a legal duty to take all appropriate measures to ensure compliance with EU limit values in the shortest time possible. It urges the Mayor and TfL to come forward with a revised ULEZ proposal which goes significantly beyond the current proposal and publish this for further public consultation as soon as possible. In parallel, the Mayor should work to develop a comprehensive air quality strategy to achieve legal compliance as soon as possible and put London on a clear path to achieving WHO guidelines. Whilst it welcomes a ULEZ it states that this will not achieve target to reduce breached limit

values occurring in both Central and Greater London.

It cites the consultation documents in noting that even a more ambitious ULEZ would not be sufficient to deliver full compliance with NO<sub>2</sub> limits, let alone the more stringent WHO Guidelines. In addition to significantly improving the ULEZ proposal, the Mayor needs to come forward with a comprehensive air quality strategy which ensures compliance with NO<sub>2</sub> limit in the shortest time possible and moving towards the more stringent WHO guidelines for PM<sub>2.5</sub>.

### **Energy Saving Trust**

Energy Saving Trust supports ULEZ but suggest that it should be strengthened by having a higher charge level and ensuring that taxis can operate in ZEC mode for 50 miles or over.

### **Friends of the Earth**

Friends of the Earth recognise the importance of tackling poor air quality in London and strongly supports the ULEZ although consider that it needs to be bigger, stronger and come in sooner and that the daily charge for coaches, vans and petrol and diesel cars is too low. It also suggests that more supporting measures need to be implemented alongside the ULEZ to further improve air quality including investing in public transport and strengthening the LEZ.

### **I Like Clean Air**

I Like Clean Air support the proposals and recognise the importance of tackling poor air quality in London. It is concerned however that the area is not large enough and suggests that it is extended to cover all inner London boroughs. It is also concerned that with the current proposals, damaging levels of air pollution will persist until at least 2030 causing significant health issues for children as they grow into adults, and it suggests that the implementation of the proposals is brought forward.

### **Living Streets**

Living Streets supports the ULEZ but would like it implemented sooner and extended to cover more of London, for example with the North and South circular as its boundary. It is keen that emission standards are tightened in the future and those measures are also taken to increase cycling and walking in London.

### **London Cycling Campaign**

The London Cycling Campaign recognises the importance of tackling poor air quality in London and supports the ULEZ proposals although considers that they go further than proposed. It suggests that the proposals should contribute towards a reduction in motor vehicle use and shift to sustainable modes including an investment in cycling infrastructure to encourage an increase in cycling. It also suggests that the

zone should be larger, that the requirements for buses should cover all buses in inner and outer London, and that the proposals should go beyond Euro 6/VI standards and includes a schedule towards zero emissions and that the ULEZ must be adopted sooner.

### **London Sustainability Exchange**

London Sustainability Exchange notes the detrimental impacts on human health from poor air quality. It presents evidence from its work around London of concentrations of poor air quality outside the proposed ULEZ and argues that the ULEZ should be extended to all London boroughs.

### **Network for Clean Air**

The Network for Clean Air recognises the importance of tackling poor air quality in London and supports the ULEZ proposals although considers that the zone should be larger, that the proposed charge should be higher for all vehicles and that the requirements for new taxis and PHVs to be ZEC could be achieved earlier than 2018. It opposes the proposed residents' exemption period.

### **Southwark Living Streets**

Southwark Living Streets strongly supports the ULEZ and says that it should cover a larger area, either to include all of Southwark or up to the South Circular Road as otherwise they are concerned vehicles could seek to avoid the charge which would have a negative consequence for these areas. It states that the higher charge for heavier vehicles is correct but that the lower charge for lighter vehicles is too low and that taxis should not be exempt from the charge but should have to pay if non-compliant just like any other vehicle as they contribute 18% of NO<sub>x</sub> emissions.

### **Sustrans**

Sustrans supports the proposals but says that more needs to be done to improve air quality including extending the zone to reflect the LEZ boundary, introducing more stringent standards i.e. only allowing ZEC vehicles into the zone and encouraging walking and cycling over motorised transport.

### **Westminster Living Streets**

Westminster Living Streets recognises the importance of tackling poor air quality in London and supports the ULEZ proposals however considers that the zone should be larger. It opposes however the proposed residents' sunset period exemption. It also proposes that all non-compliant vehicles be charged on a per entry basis rather than per day and that taxi and PHV fares are adjusted so that passengers instead of all Londoners pay for the replacement of fleets.

## **Cycling Groups**

### **Camden Cyclists**

Camden Cyclists supports the objective to tackle poor air quality in central London and the principle of the ULEZ however considers that the zone should be larger to improve air quality well outside the CCZ and that the proposed charge level for HGVs, coaches/non-TfL buses, vans and diesel cars is too low. They also oppose the proposed three year residents' exemption, the proposed reduction in age limit for non ZEC taxis to 10 years and exempting all licensed taxis from the ULEZ standards. They also consider that the proposed date for requiring new taxis and PHVs to be ZEC could be achieved earlier than 2018.

## **Disability Organisations**

### **Disabled Motoring UK**

Disabled Motoring UK is supportive of the ULEZ, noting that many of its members' illnesses are made worse by air pollution. However it states that highly adapted vehicles should be exempt, as should minibuses carrying disabled people.

### **Guide Dogs**

Guide Dogs states that electric and hybrid cars are quieter than conventional petrol and diesel cars and therefore, can be dangerous for blind and partially sighted people. It suggests that electric and hybrid cars are fitted with an Artificial Vehicle Alerting System to ensure that they are audible.

### **Joint Committee on Mobility for Disabled People (JCMD)**

The JCMD support the ULEZ proposals, recognising the importance of tackling poor air quality in London, however suggests that disabled motorists should be exempt as some severely disabled people do not use the Motability scheme and others who need particularly large or complicated vehicles which will be disproportionately impacted as they are expensive to replace.

## **Emergency Services**

### **London Fire Brigade**

London Fire Brigade supports the introduction of a ULEZ but does not comment on the detail of the proposal. It states that it requires three years' notice in order to make changes to its fleet.

## **The Metropolitan Police**

The Metropolitan Police supports the aims of ULEZ, but requests a sunset period to replace specialist vehicles that they will not be able to replace by 2020. It is fully committed to the ULEZ aims and currently plans to replace 3,800 vehicles by 1st January 2020 with cleaner ULEZ compliant models. However, 800 may not be compliant and not scheduled for replacement until after implementation.

## **Health Organisations**

### **Asthma UK**

Asthma UK is supportive of the ULEZ proposals and the importance of improving air quality in London, noting that many of its members' illnesses are made worse by air pollution. It suggests however that the zone should be larger and that the legal limits set by the European Union should be seen as the absolute minimum measure that TfL should meet.

### **British Heart Foundation (BHF)**

The BHF notes that air quality must be improved to best support heart patients and the wider UK public. It is supportive of the ULEZ proposals however it opposes the proposal that non-compliant vehicles can enter the zone if they pay a fee as they will continue to pollute the air which will have negative impacts on health.

### **Lambeth and Southwark Public Health Team**

Lambeth and Southwark Public Health states that it is important to reduce emissions in London and to improve the health of people living in Greater London. Lambeth South PH indicated that residents in more deprived areas are worst hit by air pollution and consideration should be given to them. It is also a concern that the burden of fees may affect people who drive for a living.

### **Faculty of Public Health**

The Faculty of Public Health (FPH) welcomes the ULEZ and TfL's commitment to improving air quality in London and to reduce the health inequalities that arise in air pollution in London. However it urges TfL to go further to minimise the detrimental effects of poor air quality on the health of Londoners and use this opportunity to increase the positive health impacts of the road network on health through complementary measures to promote walking, cycling and public transport use and restrain private motorised vehicle usage as appropriate. Significant changes to the look and feel of London's streets will be needed if a measurable and sustained improvement in public health is going to be delivered particularly in relation to physical activity, air quality, noise and road traffic injuries. It urges TfL to consider accelerating implementation of the ULEZ, extending the ULEZ zone across Greater London and implementing stricter emission standards before 2025.

## **NHS England (London Region)**

NHS England (London Region) outlines the adverse impacts of air pollution on human health, citing the 2014 London Health Commission report on the effects of long-term exposure. It notes that this impacts on its delivery of health care and states that reducing air pollution could prevent attributable deaths, respiratory and cardiovascular admissions. In this context, it asks TfL to consider whether the ULEZ needs to go further and faster.

## **NHS Southwark CCG**

NHS Southwark CCG requests that TfL consider extending ULEZ beyond the current extent of the proposed zone to include areas where children congregate i.e. schools.

## **Public Health England**

Public Health England supports the ULEZ proposals, however suggests that the zone should be larger and that the proposals be implemented sooner. It also recognises that the ULEZ proposals alone will not achieve legal limits and suggest supporting measures are also implemented including active travel such as walking and cycling, climate change and adaptation, community cohesion, road safety to maximise public health benefits and on-going monitoring following implementation of the ULEZ to evaluate the benefits.

## **UK Health Forum**

The UK Health Forum recognises the importance of tackling poor air quality in London to improve health of Londoners and supports the ULEZ proposals however consider that it needs to go further by expanding the proposed zone, implementing the proposals sooner, going beyond the Euro 6/VI standards towards zero emissions, insuring against failure of Euro 6/VI, improving the existing LEZ, and reducing motor vehicle journeys through increasing walking and cycling and improving public transport use.

## **Landowners**

### **The Crown Estate**

The Crown Estate supports the proposals, except for the residents' discount, which it opposes. It suggests that more can be done however including: moving to zero tailpipe emissions as quickly as possible; reducing the number of vehicles entering the zone by encouraging cycling and walking, re-routing bus routes so longer routes no longer go through central London; consolidating deliveries; discouraging taxis traveling around central London while they ply for hire; and banning diesel vehicles



initially while the standards are increased to zero emission which it believes should be by 2023.

## **Logistics Companies**

### **UPS**

UPS supports the ULEZ proposals however requests that the standards are clarified to make it clear that the standards of the maximum age of compliant vehicles in each of the vehicle categories are indicative, and that vehicles over this age that are compliant with the relevant emissions standard (i.e. Euro VI) will still be compliant. It also suggests that converting older vehicles to electric is more sustainable than buying a new electric vehicle as it prevents the need for scrappage. It supports the size of the proposed zone and requests confirmation that the zone will not be expended in future as it will become too confusing for drivers and that the highest pollutants are concentrated in central London. It also strongly supports the use of liquefied biomethane which they believe has the ability to transform the carbon footprint of HGV travel and would like Government to address the shortage of supply of this fuel.

## **London Boroughs**

### **City of London Corporation**

The City of London Corporation supports ULEZ and states that it is a vital step towards improving air quality in the Capital. It supports the charging hours, boundary and proposals with regard to taxis and PHVs. It has reservations that the scheme focuses on NO<sub>x</sub> and not PM<sub>10</sub> and PM<sub>2.5</sub> and is disappointed that it does not do more to encourage a switch from diesel. It states that there may be scope to widen the scheme if it does not meet its objectives.

### **London Borough of Barking & Dagenham**

The London Borough of Barking & Dagenham supports the ULEZ but states that the proposals do not go far enough to tackle air pollution problems across London and in the borough in particular. It notes the adverse public health impacts of poor air quality and that certain roadside locations in the borough are forecast to deteriorate. It calls on TfL to publish information on a London wide ULEZ so that its benefits can be assessed properly. It welcomes the proposals for TfL buses and for taxis and PHVs but would like the entire bus fleet to be low or zero emission capable; it also calls for the proposed date for the zero emission capable requirement for taxis and PHVs be brought forward.

## **London Borough of Brent**

The London Borough of Brent supports the ULEZ proposals within its current boundaries as long as it does not disproportionately impact local residents or businesses however would encourage that it is extended in the future to other areas of London affected by poor air quality. It also suggests possible tougher standards for diesel vehicles in the future. It suggests any funds raised by the scheme should be used on localised air quality improvement projects and that the requirements of the scheme are clearly communicated and sign posted so drivers are aware. It is lastly concerned that the ULEZ could worsen air quality in areas outside of the zone and suggests that the entire TfL bus fleet across all of Greater London become low emission or ZEC.

## **London Borough of Camden**

The London Borough of Camden considers it very important to tackle poor air quality in central London and strongly supports the ULEZ proposals however it does not think the proposals go far enough in improving air quality and requests consideration of the zone being larger, the proposals being implemented sooner, that standards are tightened and charges incrementally increased with time, and that a continual re-evaluation and monitoring of the scheme is carried out after implementation.

It is concerned that conditions outside the zone will be made worse in terms of congestion and air quality with the current proposals. It also requests removal of all proposed exemptions for all vehicle classes or age and suggests supporting initiatives such as a scrappage scheme for non-compliant vehicles and ring-fencing revenues to improve the take up of EVs and alternatively fuelled technologies.

## **London Borough of Enfield**

The London Borough of Enfield welcomes the focus on tackling poor air quality and generally supports proposals for the ULEZ. It suggests that further work should be undertaken to assess the possibility of expanding the zone and expresses concern that an increase in CO<sub>2</sub> could be an unintended consequence of the scheme and as such further measures should be looked at and as soon as possible in addition to the ULEZ including reducing the number of vehicles and encouraging modal shift to walking, cycling and public transport to further improve air quality in London.

## **London Borough of Hackney**

The London Borough of Hackney supports the principle of ULEZ but states that the current proposal does not go far enough and will not meet EU limit values for air pollution. It calls for information to be made available on the feasibility and cost/benefit of a larger scheme, potentially to be introduced in 2018. It also asks for consideration of a scheme that uses pricing to encourage modal shift and which enables boroughs to opt in to the zone. London Borough of Hackney is concerned that there is no formal commitment to progression of the scheme and that this adds to business costs and uncertainty as well as the development of vehicle technology.

### **London Boroughs of Hackney, Camden, Southwark and Lambeth (joint response)**

The London Boroughs of Hackney, Camden, Southwark and Lambeth state that they support the ULEZ but call for its boundary to be extended, noting that the current proposal will not result in London meeting the EU legal limits for air quality. They put forward potential options including an extension to the North-South Circular Road and an all-London option, stating that TfL should model the impacts of these options. The boroughs also state that there should be a further phase of the LEZ in 2025.

### **London Borough of Hammersmith and Fulham**

The London Borough of Hammersmith and Fulham supports the ULEZ however considers that it should be extended to a wider area and should include the LB Hammersmith and Fulham. It is also keen to explore what can be done to improve local air quality.

### **London Borough of Haringey**

The London Borough of Haringey supports the principle of the ULEZ however considers that the proposals should go further, suggesting that petrol vehicles should all comply with a Euro 6 standard, that the zone is expanded across London, that the bus proposals are rolled out to all fleets across the London network and that an on-going programme of air quality and traffic flow monitoring along the main road network outside the zone be conducted before and after the introduction of the ULEZ to monitor the impact of displaced traffic.

### **London Borough of Islington**

The London Borough of Islington agrees it is important to improve air quality in London and in principle supports low emission strategies. It requests that other measures apart from the ULEZ are considered in particular to create modal shift and encourage active travel. It suggests that diesel vehicles should be phased out and eventually banned and that alternative vehicle technologies are looked at instead of diesel with appropriate ultra-low and zero emission infrastructure to be made available. It also suggests that air quality monitoring is conducted in the first year to measure the effectiveness of the ULEZ and future strengthening of standards and expansion of the zone is considered.

### **London Borough of Lambeth**

The London Borough of Lambeth supports the ULEZ however considers that it does not go far enough, suggesting that the zone should be larger, that buses and taxis should be retro fitted with carbon lowering exhaust or be electric, and that action is needed sooner than 2020. It also opposes the proposed residents' 3 year exemption period, the proposed exemption for other vehicle classes, the proposal to reduce the

taxi age limit to 10 years and the proposal to exempt all taxis. It proposes supporting measures are implemented such as encouraging modal shift to sustainable forms of travel, using funds generated to support sustainable transport, area traffic management measures are included in the proposals, and that Low Emission Neighbourhoods are progressed. It also requests further work is undertaken in the future development of the scheme.

### **London Borough of Lewisham**

The London Borough of Lewisham supports the ULEZ however considers that it should be more ambitious and extended to potentially reflect the LEZ area.

### **London Borough of Merton**

The London Borough of Merton agrees it is important to improve air quality in London and supports the ULEZ proposals although suggests they should be implemented sooner, the zone be expanded and stricter emission standards are implemented before 2025. It also encourages complementary measures to promote walking; cycling and public transport use and restrain private motorised vehicle usage as appropriate.

### **London Borough of Newham**

The London Borough of Newham supports tackling poor air quality as well as the ULEZ proposals however considers that the zone should be larger to gain wider benefits of improved air quality and to alleviate concerns of the impact of the proposals on the zones outside of the proposed boundary. It also suggests more work may be necessary to identify the impacts of the proposed charges on business and provision for a scrappage scheme should be considered. It suggests that in time the entire TfL bus fleet operating in Greater London should become low emission and that requirements are strengthened to require zero emission capability for vehicles.

### **London Borough of Redbridge**

The London Borough of Redbridge considers it very important to tackle poor air quality in central London and supports the proposals including the proposed boundary, hours of operation, the level of charge for all vehicles and the proposals for buses and taxis/PHVs. It suggested that should an expansion of the zone be considered feasible at a future date, then coverage of the whole of London would be more appropriate than an alternative proposal to use the North and South Circular Roads as potential boundaries, which it would not support.

### **London Borough of Richmond upon Thames**

The London Borough of Richmond upon Thames agrees that it is important to tackle poor air quality in central London and supports the proposals for a ULEZ however

suggests that they should be implemented sooner, the zone should be larger and that stricter emission standards are implemented before 2025 citing reasons of health. It also suggests that supporting measures need to be implemented including promoting walking; cycling and public transport use as well as restraining private motorised vehicle use.

### **London Borough of Sutton**

The London Borough of Sutton agrees it is important to improve air quality in London and supports the ULEZ proposals however opposes the proposed residents' sunset period and considers that the zone should be larger. It also suggests that consideration should be given for a scrappage scheme, that revenue is used for improvements to sustainable transport, and that charging should be on a sliding scale with a greater number of different rates according to emissions.

### **London Borough of Southwark**

The London Borough of Southwark is committed to the reduction of emissions from transport and the improvement of air quality with the borough and across London as a whole. The borough supports the principle of the ULEZ. It is concerned that vehicles who will not want to enter ULEZ due to the costs will reroute to avoid crossing the zone. These vehicles will be of poorer quality and producing higher emissions. A full and accurate assessment of the impact of displaced vehicles and vehicles rerouting or skirting the zone must be undertaken to identify the holistic impacts of the ULEZ and determine a more effective boundary that seeks to bring greater benefit to areas of deprivation and low income homes. Southwark also welcomes a Low Emission neighbourhood.

### **London Borough of Tower Hamlets**

The London Borough of Tower Hamlets supports the ULEZ proposals however considers that the zone should be larger.

### **London Borough of Waltham Forest**

The London Borough of Waltham Forest supports the ULEZ proposals and welcomes the initiative to improve air quality. However it considers that the zone should be expanded to reduce pollution levels even further. It also strongly opposes the proposed three year exemption for residents.

### **London Borough of Wandsworth**

The London Borough of Wandsworth agrees it is important to improve air quality in London and supports the ULEZ proposals although ideally would like to see them implemented sooner and the zone expanded at some point. It also suggests the charge for large vans or minibuses should be higher and that other measures apart from the ULEZ are considered as a solution to poor air quality.

## **London Councils**

London Councils supports ULEZ, but states that more could be done to address London's air quality problems. It suggests extending the zone and introducing more stringent criteria for all private cars, PHVs and taxis. It requests longer exemption for residents living within the ULEZ, given they have no option to avoid the ULEZ proposing a five-year period. It supports the proposal for the ULEZ to be operational 24 hours a day, all year round as it is not appropriate to try to shift more polluting journeys to different times of the day. It encourages TfL to introduce a scrappage scheme for owners of cars that will not meet the ULEZ standards. This will boost efforts to remove the most polluting vehicles from London's roads, whilst at the same time ensuring that owners can get a good price for their vehicles if they choose to upgrade to a less polluting vehicle.

## **Royal Borough of Greenwich**

The Royal Borough of Greenwich supports ULEZ, but states that zone should mimic the LEZ boundary. It raises concerns about the level of congestion and pollution increasing within the non-Central London boroughs as a result of ULEZ. It also states that ZEC requirements for taxis and PHVs could be introduced earlier than 2018.

## **Royal Borough of Kensington & Chelsea (RBKC)**

The Royal Borough of Kensington & Chelsea acknowledges the need to improve air quality in London and supports ULEZ in principle but calls for its boundary to be extended to include at least this borough, and potentially others possibly by using the North and South circular as limits. The Borough also requests clarity on the expected benefits of zero emission capable taxis and PHVs. It is supportive of the proposed emissions standards, charges and operating hours and suggests ways to enhance the proposal, for example bringing forward the date for ZEC taxis and ensuring that all buses on routes in RBKC meet the ULEZ standards.

## **Westminster City Council**

Westminster City Council supports the principle of reducing emissions however expresses concern that the proposed ULEZ falls short of what it should achieve. It requests that the Mayor consider strengthening the proposals, including the zone boundary and effectiveness of Euro VI technology. It would like a consideration of earlier and wider implementation as well as a consideration of a diesel vehicle ban. It urges TfL to lobby for a Government funding scheme to help people buy new vehicles; to engage with the borough to consider developing rapid charging infrastructure; look at promoting alternative fuels; strengthening standards for taxis and buses and reduce bus numbers where possible.

## **Motoring Organisations**

### **680&MO Club**

The 680 & MO club agrees that it is important to tackle poor air quality in central London and supports the proposals for a ULEZ and in particular that non-compliant HGVs, vans/minibuses and diesel cars pay a charge to enter the zone from 2020. It opposes the proposal to enforce the ULEZ 24 hours a day, 365 days a year, the proposals for newly licensed taxis and PHVs to be ZEC from 2018 and the proposed £12.50 charge for petrol cars considering this to be too high.

It also expresses concerns regarding how classic cars will be dealt with under the proposals and puts forward alternative policy suggestions so that these are exempt or alternatively licenses are granted for so many days a year which will allow non-compliant classic cars to enter the zone without having to pay a charge.

### **Alliance of British Drivers**

The Alliance of British Drivers opposes the introduction of a ULEZ and strongly opposes the standards proposed for petrol and diesel cars. While ABD states that diesel vehicles should be discouraged, it opposes the introduction of different standards in London compared to the rest of the UK.

### **Automobile Association (AA)**

The Automobile Association (AA) notes that air quality has improved in London in recent years, in part due to improved vehicle technology, but states that it understands the need to take further action. It is concerned that the scheme may adversely impact those least able to afford it but is supportive of the proposals for TfL buses and the boundary of the zone.

### **British Motorcyclists Federation**

The British Motorcyclists Federation welcomes the initiative to improve air quality in London as this will have a positive effect on the health of its members and supports the ULEZ proposals except for the proposed standards for motorcycles, noting that any actions which actively discourage the use of motorcycles in urban areas are detrimental to the city as a whole. It suggests that the proposed non-compliance of Euro 3 motorcycles be reconsidered as by 2020 there will be a tiny proportion of these vehicles on the road and argue that these vehicles will be owned by people on low incomes and by students. It also suggests that TfL's estimated pollution figures relating to powered two wheelers (PTWs) are misleading as they do not reflect shorted running times of PTWs compared to any other powered vehicle type.

### **Federation of British Historic Vehicle Clubs**

The Federation of British Historic Vehicle Clubs recognises the importance of tackling poor air quality in London and supports the ULEZ however it is primarily

concerned with the proposed exemptions for historic vehicles, suggesting that it should be specifically linked to exemption from VED so that they are exempt on an annual rolling basis to continually cover all vehicles over 40 years old instead of defining historic vehicles as any vehicle constructed before 1 January 1973.

### **Motorcycle Action Group**

The Motorcycle Action Group supports the overall aims to improve air quality in London, but states that charging motorcycle riders the same charges as cars and vans is unjustified. It also suggests that the proposals will affect the poorest in society. It suggests that there is not enough research to identify the numbers of non-compliant vehicles as part of ULEZ, and therefore, states that TfL has overestimated the level of emissions which would be contributed from motorcycles.

### **Motor Cycle Industry Association (MCIA)**

The MCIA supports the principle of improving air quality through reducing emissions however is concerned that the current ULEZ proposals will have more impact on the motorcycle industry than anticipated. It suggests the proposals pertaining to motorcycles should be changed to further develop low emission and alternatively powered and electric motorcycles and battery charging infrastructure. It also considers the charge for motorcycles too high as they emit a lower proportion of emissions than other light vehicles and that revenue from motorcycles is spent on supporting low emission and alternatively powered motorcycles.

### **RAC Foundation**

The RAC Foundation supports the introduction of ULEZ and the approach taken with regard to having the option to use a compliant vehicle or pay a daily charge. However it has concerns about the effectiveness of the proposals given the disparity in real-world emissions and vehicle testing emissions. It also notes that the age of the vehicle will have an impact on its emissions and suggests that Euro 6 be specified for petrol vehicles as well as diesel as these vehicles would be affordable and only a small proportion of drivers would be affected. Similarly, it is concerned that the proposals will encourage non-compliant diesel users to switch to much older Euro 4 petrol. For PHV drivers there might be an incentive to retain older vehicles prior to the introduction of the ZEC requirement. Also with regard to ZEC taxis and PHVs, it notes that there is no compulsion to operate in zero emission mode and the need to install the right charging infrastructure.

### **RAC Motoring services**

RAC Motoring Services is generally supportive of the proposal and its operational approach. However it has concerns about drivers (particularly in lower income groups) who have been incentivised in the past to buy diesel vehicles and who may now buy an older petrol car in order to comply with the standards. It proposes an exemption for smaller diesel cars in the first five years of the ULEZ. It also calls



attention to the need to publicise the ULEZ decision as soon as possible to enable drivers to make informed choices.

## **Other organisations**

### **Air Training Corps (ATC)**

The Air Training Corps opposes the ULEZ but is supportive of standards for buses, taxis and PHVs. It states that there should be an exemption for charity minibuses.

### **London Forum of Amenity and Civic Societies**

The London Forum of Amenity and Civic Societies support the proposals but do not believe that they go far enough to meet European limits. It suggests that the current set of proposals should apply to all Inner London boroughs, as well as to areas in outer London (especially around Heathrow) that are currently subject to high levels of air pollution from vehicles. It also suggests that incentives should be made available for vehicle users to switch from diesel vehicles to petrol or ultra low emission vehicles and that significant differential charging should be introduced between petrol and diesel vehicles with petrol vehicles paying a relatively low charge and diesel vehicles a relatively high charge.

### **London Transport Museum**

The London Transport Museum requests consideration for historic vehicles taking part in events in London. It suggests that they could be exempt on basis of age or for a discrete period of time whilst event is taking place.

## **Political Representatives**

### **Environment Audit Committee**

The Committee recognises the pressure that London is under to improve air quality and supports TfL's ambition to improve London's air quality. It however, thinks that the ULEZ is ambitious and likely to set a precedent for the adoption of similar schemes across the UK and Europe. It is therefore critical that the design is right from the outset, and believe that this is best achieved by setting the exemption level for all passenger and light commercial vehicles at Euro 6- regardless of fuel type.

### **Jenny Jones (AM, Green Party)**

Jenny Jones AM states that the current proposal is insufficiently far-reaching and will not achieve compliance with EU limit values. Ms Jones argues that the scheme will not achieve political consensus and must be made stronger, with the potential for

modification in future. The scheme should allow local authorities to opt in and the charge should be higher, with separate zones set up around Heathrow and other air quality hotspots.

### **Jon Cruddas MP**

Jon Cruddas, MP for Dagenham and Rainham, considers it very important to tackle poor air quality in London and supports the ULEZ proposals however suggests that standards should be higher in that Euro 6 should apply for petrol vehicles as well as diesel to maximise air quality benefits sooner. He notes that a 14 year old petrol vehicle in 2020 would still comply with the ULEZ however would emit far higher levels of pollution than in its first 5 years of life. He also expresses concern about the impact of the proposals on the diesel vehicle market and manufacturing industry due to the difference in standards between diesel and petrol and the 'dirty diesel' rhetoric.

### **London Assembly**

The London Assembly supports ULEZ but calls on the Mayor (with the boroughs and national Government) to consider ways in which London could meet air pollution limits by 2020. It would like ULEZ to be implemented earlier and greater consideration given to an expansion of the zone soon. Generally it supports the emission standards but states that Euro VI heavy vehicles should be exempt; it also states that all of London's Euro V hybrid buses should be retrofitted to meet Euro VI by 2020. The Conservative Group dissents from the London Assembly response: the Green Party and Liberal Democrat Group support it but state the ULEZ should go further.

### **London Assembly Labour Group**

The London Assembly Labour Group supports the ULEZ in principle but states that it should be expanded to cover other areas of air pollution and that boroughs should be able to opt in to it. It also calls for the Mayor to set out commitments for expansion and for strengthening of vehicle emissions standards and potentially a review of charges. It states that there must be a willingness to consider a vehicle ban if the scheme does not achieve its objectives. It is keen to see information on charging infrastructure and on future plans for buses.

### **London Assembly Liberal Democrat Group**

The London Assembly Liberal Democrat Group strongly supports interventions to improve air quality in London but states that the current proposal does not go far enough. It would like the zone expanded and the standards tightened; it notes that in 2020 a Euro 6 vehicle could be five years old. It advocates introducing a small charge from 2016 which is then increased. It calls for TfL to upgrade all its Euro V hybrid buses to Euro VI and states that TfL should buy a fleet of ZEC taxis and lease them to drivers in order to achieve rapid replacement.

## **Political Organisations**

### **Camden Green Party**

Camden Green Party states that the ULEZ proposal coverage is too small and too weak to protect the health of people in Camden and inner London, and is too late. The ULEZ needs to be extended beyond the current Congestion Charge zone to include all inner London boroughs, and the whole of Camden. The proposals also do not provide a sufficient deterrent for the most polluting vehicles, putting forward a levy of just £12.50 on diesel cars and vans entering the ULEZ from 2020 onwards.

### **Islington Green Party**

The Islington Green Party supports the ULEZ proposals however suggest that the zone should be larger to include Islington and that the daily charge be increased for all vehicles so that it is punitive. It opposes the proposed residents' exemption and would like to see a timetable from TfL for phasing out hybrid double deck buses beyond 2020. It also proposes that all taxis should be zero emission by 2020 and diesel vehicles to be banned by 2020. It also requests TfL to set out a clear timetable for progressively improving emissions standards with a clear path towards zero emission standards for all vehicles. And that the principle of demand

### **Lambeth Green Party**

The Lambeth Green Party considers it very important to tackle poor air quality in London and supports the proposals of the ULEZ however considers that the zone should be larger and should include Lambeth which it notes has been proven to suffer major problems with air pollution. It opposes however the proposed exemptions for residents and taxis as well as reducing the taxi age limit and the requirement for PHVs to meet the ULEZ standards for private cars in order to drive in the ULEZ without paying a daily charge.

### **Richmond Park Liberal Democrats**

The Richmond Park Liberal Democrats state that they think that restrictions should be in place so that only zero or near zero emission vehicles enter Central London. This should be supported by incentives to that people upgrade or replace their vehicles. They do not support the ULEZ charging scheme. Management (e.g. reducing motor vehicle journeys) should be properly incorporated as one of the objectives of the ULEZ and the ULEZ proposal should integrate with the existing Low Emission Zone (LEZ) so that the two schemes complement each other, proposing that the LEZ will need to apply to all vehicles and progressively tighten minimum compliance standards.

## **Residents Associations**

### **Belgravia Resident Association**

The Belgravia Residents Association considers it very important to tackle poor air quality in central London and strongly supports the principle of and the proposals that make up the ULEZ. Its main concern however is that the Victoria Coach Station, which is a major generator of pollution in the area, will be located outside of the proposed zone. It also notes that the proposals will do little to help congestion in West London. It also queries how much pollution is generated from tyres and road surfacing and to what extent the proposals for the ULEZ will address this.

## **Statutory Groups**

### **London TravelWatch**

London TravelWatch supports ULEZ and a potential strengthening of the standards in future. However it considers that TfL buses are an important part of the solution to air quality problems and that the focus should be on the shift from private car use.

## **Trade Associations**

### **Confederation of Passenger Transport**

CPT agrees that air quality in London needs to be tackled but believes that proposals will have a negative impact on coach industry. They do not believe that retrofitting options will be available. They say that the lifespan of coaches can be up to 25 years which will mean that under ULEZ; operators will need to replace their vehicles much earlier than anticipated. This will have a negative financial impact on the industry. They request that TfL considers providing a sunset period for the coach industry similarly to what is being proposed for residents.

### **The British Vehicle Rental and Leasing Association (BVRLA)**

The BVRLA recognises the importance of tackling poor air quality and supports the proposals for a ULEZ however suggests alternative forms of transport within the ULEZ is considered, in particular car rental and car sharing which will add to benefits realisation as these types of vehicles are commonly new vehicles with the latest technology thereby being less polluting than older vehicles.

It also offers alternative and supporting policy suggestions including: having a one year transitional period where non-compliant vehicles are not charged but receive a warning letter to raise awareness; that the regulations for HGVs are extended by 5 years to 2025 to provide time for suitable technology to be developed; to consider a

fair and simple approach to paying both the LEZ and ULEZ charges for example via a single portal; that businesses operating within the zone receive the same exemptions as domestic residents; that all funds raised are used for transport improvement projects; and that a national framework is implemented to provide guidance on a common nationwide emissions standard for Low Emission Zones throughout the country.

## **Transport Organisations**

### **Freight Transport Association (FTA)**

The Freight Transport Association notes the progress made by HGV manufacturers and operators in reducing emissions from these vehicles and in this context welcomes the fact that ULEZ would apply to all vehicle types. It notes that while many businesses can reconfigure their fleet to comply with ULEZ, small businesses may find this more difficult and so calls for a time-limited discount for small businesses and specialist fleets, akin to the proposed resident's discount. It states that any future strengthening of the scheme must take into account the vehicle range available at that time.

### **SMMT**

The SMMT is generally supportive of the proposals including: the proposed geographical area; the hours of operation; requirements for heavy commercial vehicles to be Euro VI from 2020; the measures to increase uptake of ultra-low emission vehicles through ambitious but realistic 'zero emission capable' requirements for taxi and private hire vehicles; the approach being taken by TfL that includes additional requirements for buses which supports the market for hybrid and zero emission buses; and the reduction in the age limit from 15 to 10 years for taxis.

Its main concern is the proposed Euro 4 standard for petrol vehicles. It believes the proposals should be technology neutral and Euro 6 across the board, for petrol and diesel vehicles. It also notes that the provisions for existing Euro V hybrid buses overlook the wider benefits of a comprehensive Euro VI standard and risks establishing a precedent that reduces TfL's responsibilities and ambition with its own fleet to procure the cleanest and most efficient buses.

### **The Environmental Industries Commission**

The Environmental Industries Commission is supportive of the ULEZ scheme however would support the national roll-out of a National Network of Ultra Low Emission Zones. It suggests retrofit technology is currently available and cost effective and should be permitted in the proposals for smaller buses/coaches/HGVs and that retrofitting black cabs to be ZEC should be proposed instead of reducing the age limit. It also considers that the zone should be larger to cover the whole of

London and that standards should be higher for all vehicles operating in the ULEZ and suggests that non-compliant vehicles should not have the option to pay to enter the zone. It also promotes the use of LPG autogas as a fuel solution.

### **UK Hydrogen and Fuel Cell Association**

The UK Hydrogen and Fuel Cell Association support all of the ULEZ proposals. In addition, it promotes the use of fuel cell electric vehicles.

## **Transport Lobby Groups**

### **Transport Watch**

Transport Watch does not support the proposals. It states that the proposals are flawed and will not bring health benefits.

## **Voluntary Organisations**

### **Age UK London**

Age UK London recognises the importance of tackling poor air quality in London and strongly supports the ULEZ proposals however considers that the proposals do not go far enough suggesting that the zone should be larger, that the proposals are implemented earlier, that it should go beyond Euro 6 standards with a clear path towards zero emission standards for all vehicles, that all vehicles including taxis are included in the proposals and pay a charge, and that a review mechanism is built into the proposals so the scheme can be strengthened if it is not having sufficient impact in reducing emissions.

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## **Taxi & PHV licensed bodies and other related organisations**

### **Addison Lee**

Addison Lee supports the Mayor's wish to improve air quality in London. It supports ULEZ and the proposal to implement a Euro 4 and Euro 6 standard by 2020 but has concerns about implementing the proposed requirements for PHVs. It notes that PHVs contribute only 4 per cent of vehicle emissions and one per cent of total emissions. It states that zero emission requirements for PHVs are not viable within the proposed timescales, owing to insufficient vehicles on the market and the fact that no ZEC 7-seaters are currently available.

## **Cab drivers Newspaper**

Cab Drivers Newspaper disagrees with the 10 year age limit and state that a medium sized fleet would have to spend £2 Million to replace its fleet of 50 taxis if ten year age limit applied. It is concerned that vehicle values will plummet.

## **GMB Professional Drivers Branch (GMB)**

The GMB agrees that emissions in London are far too high and needs to be lowered as a matter of urgency however notes that the existing proposals are too farfetched. It quotes cost impacts on individuals and businesses of upgrading vehicles and expresses concerns about the unavailability of vehicles that meet the proposed standards, as well as the lack of charging infrastructure and the high costs of implementing this. In addition, it suggests numerous alternative policy suggestions including but not limited to proposing certain types of battery, banning HGVs during the day to reduce congestion and emissions and improving safety for cyclists, banning Pedicabs, considering smaller buses, allowing PHVs access to bus lanes, higher charges for HGVs, and charging motorcycles based on noise levels as well as emissions.

## **Institute of Professional Drivers and Chauffeurs (IoPDC)**

The IoPDC support the introduction of a ULEZ and believes that this will have very little or no effect on the trade as Operators change fleet of vehicles every 3 – 4 years with car manufacturers developing new cars every 5-7 years to keep up with latest designs, technology and to reduce maintenance. It does however highlight the issue with charging points in that Fleet operators and taxi drivers are cautious to change through lack of charging infrastructure. It concludes that the Mayor and TfL need to weigh up the costs of implementing the Ultra Low Emission Zone by 202 and asks whether this time frame is realistic, suggesting that 2023 may be more appropriate.

## **London Cab drivers club**

LCDC state that the 30 mile range will require larger battery packs and increase charge times and therefore vehicle emissions. LCDC also disagrees with TfL CO<sub>2</sub> limit, stating it is half the EU target of 95g/km. It doubts that TfL will achieve 2018 proposed introduction dead line due to lack of available vehicles meeting the requirements. It recommends TfL should not consider introducing the zero emission standards until there are vehicles in operation, meeting these standards. LCDC predicts that the cost of replacing taxis under the proposed 10 year limit would far exceed the proposed £40 million that would be available to support the change, estimating the cost at nearer £200 million. An alternative would be to incentivise the uptake of Euro 6 equipped vehicles and therefore reduce emissions.

## **London Taxi Company (LTC)**

LTC support a more ambitious pure EV range of at least 60 miles with an even lower then required CO<sub>2</sub> value of no more than 40g/km. In order to encourage uptake,

ahead of the 2018 implementation, industry must be supported by grants to assist purchaser from at least 2017, when LTC aim to have vehicles to market, and extend the plug in grant limit until at least 2020. LTC are currently investing 200 million in developing new vehicles which will meet the proposed requirements. To reduce financial impact a grant of £10,000 towards purchase and provide sufficient funds to include an additional plug -in- car grant.

LTC recommends a 15 year age limit for Euro 6 and 12 years for Euro 4/ 5 to reduce impact of introducing new technologies, and there should be no distinction between petrol or diesel Euro 6 vehicles. By applying the age limits mentioned above this would stagger the introduction of new ZEC removing 11,000 vehicles and reduce manufacturing demand.

LTC the go on to say the only viable solution currently is for the introduction of a Range Extender Vehicle and they defines a ZEC vehicle as one that produces no more than 40g/km CO<sub>2</sub>, pure EV range of 60 miles and REE engine of Euro 6 standard. This would reduce range anxiety compared to a pure EV. Should not mandate use of ZEC in ULEZ areas until industry have become used to the technology and must start implementing the introduction of a charging infrastructure at ranks and rest areas. It is felt by LTC that that investment, nationally and within London, is not sufficient and will not currently meet the ULEZ demands

### **Licenced Taxi Drivers Association**

It proposes alternative ways to reduce emissions including the planting specific tree species(Green walls), banning selected non commercial vehicles from the centre with a £100 fine be levied as opposed to £12.50 charge.

### **London Motor Cab Proprietors Association (LMCPA)**

The LMCPA recognises the importance of clean air and although it does not specifically oppose the principle of a ULEZ it does however strongly oppose the proposed reduction of the taxi age limit to 10 years suggesting that to do so would bring the 300 year old London Black Cab Trade to an end. It highlights the lack of available vehicles but states that if a vehicle like the Frazer Nash Metro cab was to be priced comparable to the TX1, and then drivers will be persuaded to buy such a vehicle with such low fuel costs.

### **London PediCabs Operators Association (LPOA)**

The LPOA states that is it very important to do something about Air Quality in London and strongly supports a ULEZ for all vehicles apart from motorcycles where it notes that charges may be too high. It states that the proposals are a good step in the right direction to improve air quality in central London and to further reduce congestion.

### **London Private Hire Car Association (LPHCA)**



The LPHCA states that it is committed to the aims and objectives of the ULEZ. However, it is concerned with the proposal for PHV vehicles becoming zero emission capable. Its concerns are that there is a lack of physical infrastructure, road space and availability of suitable vehicles, alongside prohibitive and unrealistic costs. It states that 2018 is too early for the introduction of the ZEC requirement.

The following companies are members of the LPHCA and commented on the proposal within LPHCA's response:

Crawford Cars  
Cruise Minibuses Ltd  
Spotty Cars

### **Private Hire Board**

The Private Hire Board is in broad agreement with the ULEZ proposal but is not supportive of the measures proposed for PHVs. It states that there are too few ZEC models available which suit the diverse needs of the PHV market and that these are too expensive to be viable. It proposes a Euro 6 standard for new vehicles and a Euro 5 standard for second-hand PHVs new to licensing, with an exemption for hybrids. It also suggests other incentives for increasing the hybrid fleet.

### **Uber**

Uber welcomes the move towards a greener bus fleet and public transport. Uber would welcome the 2018 zero emission capable licensing requirement if production can keep up with demand and appropriate charging infrastructure is in place.

### **The United Cabbies Group**

The United Cabbies group does not support the proposed reduction of the taxi age limit from 15 years to 10 years and believes that harmful pollution will increase. It states that it does not support TfL scrapping 6,000 London Taxis at great expense to taxi drivers and operators which has now created a significantly increased cost of taxi rental and purchase. It states that there is only one type of zero emission taxi available on the market and that drivers would be forced to buy this model. It states that even with the infrastructure in place (which is not currently), this lack of model choice would render the ZEC proposal unacceptable.

### **Unite the Union (Cab section)**

Unite the Union supports improving London's air quality through an introduction of ZEC vehicles however notes that grants to assist drivers in purchasing the vehicles would be needed as well as a network of charging infrastructure. It opposes the reduction in age limit for taxis to 10 years noting that this proposal cannot be supported due to the uncertainty around grant availability, funding, vehicle availability and cost, and charging infrastructure. It also claims the reduction in age limit is

unnecessary as taxi drivers will move to ZEC vehicles once the benefits of owning a ZEC vehicle are realised and state that it is difficult to see why any driver would upgrade to a Euro 6 vehicle in 2015 given it will only have a 10-year age limit, with consequential impacts on vehicle manufacturers. It also calls for parity between taxis and PHVs in particular that any newly licensed PHV irrespective of age must be ZEC.

## Appendix E: The ULEZ consultation questionnaire

### Have your Say

#### On the Proposed Ultra Low Emission Zone- ULEZ (27 October 2014 - 9 January 2015)

Please choose one option for each question unless asked otherwise.

#### Section 1 – About you

*Please tell us about yourself. This will help us to analyse responses and contact you in the future.*

#### Privacy notice

Transport for London (TfL), its subsidiaries and service providers, and the Greater London Authority will use your personal information for the purpose of administering this consultation and assessing opinions on the proposed changes to the Congestion Charging scheme. Your personal information will be properly safeguarded and processed in accordance with the requirements of the Data Protection Act 1998. Responses to the consultation may be made publically available, but any personal information will be kept confidential. You do not have to provide any personal information, but this information may help TfL to understand the range of responses. For example, responses may be analysed by postcode to help identify local issues.

1. What is your name?

2. What is your email address?

*This is optional, but if you enter your email address then you will be able to return to edit your response at any time until you submit it. You will also receive an acknowledgement email when you complete the consultation (for online respondents only)*

3. In what capacity are you responding to this consultation?

- As an individual
- As a taxi (black cab) driver/owner
- As a private hire vehicle (PHV)/minicab driver/operator/owner
- As a representative of a Government Organisation

- As a representative of a business
- As a representative of a community or voluntary organisation
- As a representative of a campaign group

4. If responding on behalf of an organisation, business or campaign group, please provide us with the name:

5. If you have selected 'taxi or PHV' in Question 3, please indicate which of the following best describes you. Otherwise please go to **Question 9**

- Taxi driver – All London driver
- Taxi driver – Suburban driver
- Taxi vehicle owner
- Private hire operator
- Private hire driver
- Private hire vehicle owner

6. If you selected 'taxi vehicle owner' in **Question 5**, how many vehicles do you own?

- 1
- 1-20
- 21-50
- 50-100
- More than 100

7. If you have selected 'private hire operator' in **Question 5**, are you a:

- Small operator (1 or 2 vehicles)
- Standard operator (over 2 vehicles)

8. If you selected Private hire vehicle owner in Question 5, how many vehicles do you own:

- 1
- 1-20
- 21-50
- 50-100
- More than 100

9. What is your postcode (of your home or business)?

10. How did you hear about this consultation?

- Received an email from TfL
- Read about the consultation on the TfL website
- Read about it in the press
- Through social media
- Other (please specify below)

## Section 2 – Travelling in London

11. What types of transport do you use in central London? (please tick all that apply)

- Vehicles for private use
- Vehicles for commercial use
- Taxi (black cab)
- PHV (minicab)
- Bus
- Bike
- Walk
- Tube

12. Do you drive in the Congestion Charge Zone, if so, how often?

- every day
- 3-6 days a week
- 1-2 days a week
- 1-2 days a month
- Less than once a month
- Never

## Section 3: General Questions

13. In your opinion, how important is it to tackle poor air quality in central London?

- Very important
- Important

- Neither Important or Unimportant
- Unimportant
- Very unimportant
- Don't know

14. Do you support an Ultra Low Emission Zone (ULEZ) in central London to encourage the use of low emission vehicles to improve air quality?

- Strongly support
- Support
- Neither Support or Oppose
- Oppose
- Strongly Oppose
- Don't know

#### Section 4: The ULEZ standards

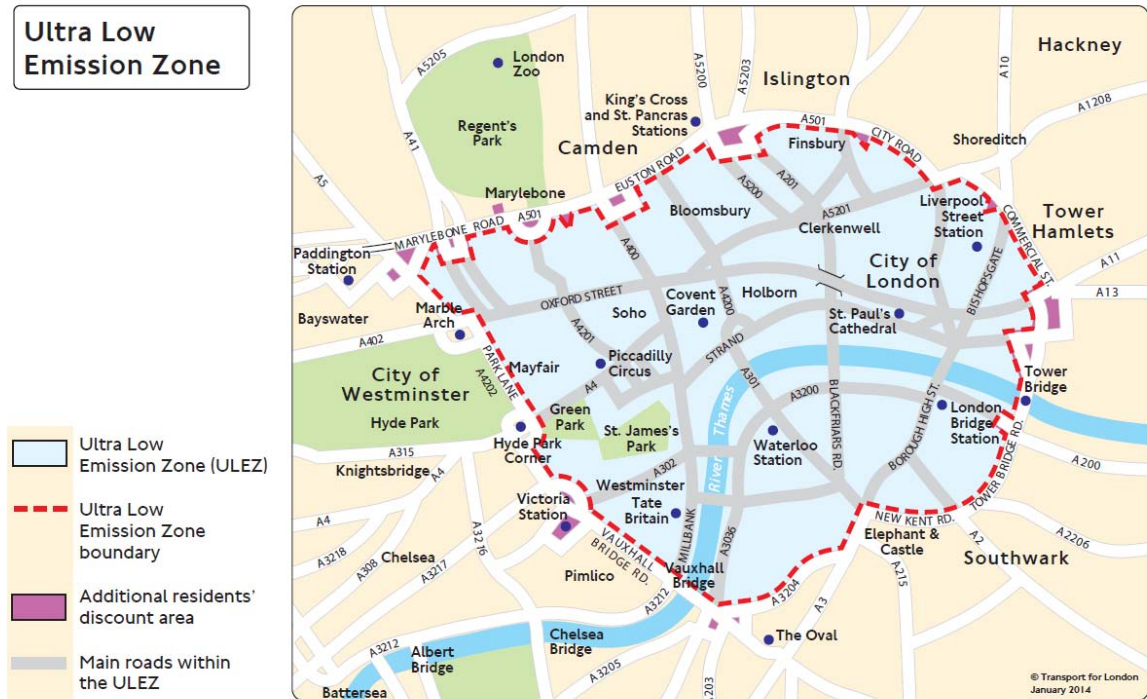
15. It is proposed that private and commercial vehicles that do not meet the ULEZ standards must pay a daily charge to drive within the ULEZ from 2020. Do you support this?

|   | <b>Strongly support</b> | <b>Support</b> | <b>Neither support or oppose</b> | <b>Oppose</b> | <b>Strongly oppose</b> | <b>No opinion</b> |
|---|-------------------------|----------------|----------------------------------|---------------|------------------------|-------------------|
| <b>HGVs</b>   |                         |                |                                  |               |                        |                   |
| <b>Coaches / buses</b>                              |                         |                |                                  |               |                        |                   |
| <b>Vans / minibuses</b>                             |                         |                |                                  |               |                        |                   |
| <b>Diesel cars</b>                                  |                         |                |                                  |               |                        |                   |
| <b>Petrol cars</b>                                  |                         |                |                                  |               |                        |                   |
| <b>Motorcycles (and other powered two wheelers)</b> |                         |                |                                  |               |                        |                   |

16. Do you think the proposed boundary of the ULEZ shown on the map is the appropriate area for charging vehicles which do not meet the ULEZ standards?

- Yes
- No, should be a smaller area
- No, should be a larger area
- No Opinion
- Don't know

## Map of proposed boundary



17. Do you support the proposal that the ULEZ standards would be enforced 24 hours a day, 365 days a year?

- Strongly support
- Support
- Neither support or oppose
- Oppose
- Strongly oppose
- No opinion
- Don't know



18. Do you think the proposed charge (£100 for heavy vehicles and £12.50 for cars, vans and powered two wheelers) is appropriate?

|   | Yes | No, too low | No, too high | No opinion | Don't know |
|---|-----|-------------|--------------|------------|------------|
| <b>HGVs</b>   |     |             |              |            |            |
| <b>Coaches/non TfL buses</b>                        |     |             |              |            |            |
| <b>Vans</b>   |     |             |              |            |            |
| <b>Diesel cars</b>                                  |     |             |              |            |            |
| <b>Petrol cars</b>                                  |     |             |              |            |            |
| <b>Motorcycles (and other powered two wheelers)</b> |     |             |              |            |            |

19. It is proposed that residents in the ULEZ would not need to meet the ULEZ standards until 2023 (and therefore not pay a daily charge until then). Do you support this?

- Strongly Support
- Support
- Neither support or oppose
- Oppose
- Strongly oppose
- No opinion
- Don't know

**Section 5: TfL Buses in the ULEZ**

20. Do you support the proposal for TfL to operate only hybrid double deck and zero emission single deck buses on bus routes operating through the ULEZ?

- Strongly support
- Support
- Neither support or oppose
- Oppose
- Strongly oppose
- No opinion
- Don't know

**Section 6: Taxis and Private Hire Vehicles (PHVs) requirements**

21. Do you support the proposals to reduce emissions from taxis and private hire vehicles by:

a) Introducing a requirement in 2018 that newly licensed vehicles would be zero emission capable for:

|              | <b>Strongly support</b> | <b>Support</b> | <b>Neither support or oppose</b> | <b>Oppose</b> | <b>Strongly oppose</b> | <b>No opinion</b> | <b>Don't know</b> |
|--------------|-------------------------|----------------|----------------------------------|---------------|------------------------|-------------------|-------------------|
| <b>Taxis</b> |                         |                |                                  |               |                        |                   |                   |
| <b>PHVs</b>  |                         |                |                                  |               |                        |                   |                   |

22. Do you support the proposals to reduce emissions from taxis and private hire vehicles by:

b) Reducing the London wide age limit for non-zero emission capable taxis to 10 years and exempting all licensed taxis from the ULEZ standards (and therefore daily charge)

- Strongly support
- Support
- Neither support or oppose
- Oppose
- Strongly oppose

- No opinion
- Don't know

23. Do you support the proposals to reduce emissions from taxis and private hire vehicles by:

c) Requiring PHVs to meet the ULEZ standards for private cars in order to drive in the ULEZ without paying a daily charge (similar to other cars and vans)

- Strongly support
- Support
- Neither support or oppose
- Oppose
- Strongly oppose
- No opinion
- Don't know

24. Do you think the proposed date of 2018 for requiring new taxis and PHVs to be zero emission capable is:

|              | <b>About right</b> | <b>Could be achieved earlier than 2018</b> | <b>Can't be achieved until later than 2018</b> | <b>No opinion</b> | <b>Don't know</b> |
|--------------|--------------------|--|--|-------------------|-------------------|
| <b>Taxis</b> |                    |  |  |                   |                   |
| <b>PHVs</b>  |                    |  |  |                   |                   |

## Section 7: Your comments on the ULEZ proposal

25. Please write in the box below if you wish to make any other comments about any aspect of the ULEZ proposal including on any potential exemptions or expand on any of your responses above.

## Section 8 - Questions about the future of the scheme

26. As vehicle technology advances, TfL may consider strengthening the ULEZ standards at a later date to set a zero emission capable requirement. Do you support this in principle?

- Strongly support
- Support
- Neither support or oppose
- Oppose
- Strongly oppose
- No opinion
- Don't know

27. Would you support a future expansion of the area of the ULEZ to spread the benefits of improved air quality to other parts of London?

- Strongly support
- Support
- Neither support or oppose
- Oppose
- Strongly oppose
- No opinion
- Don't know

## Your Views

TfL invites you to provide your views on all the proposals set out in this leaflet by completing the questionnaire online at [tfl.gov.uk/ultra-low-emission-zone](http://tfl.gov.uk/ultra-low-emission-zone). Alternatively you can request a copy of the questionnaire by calling us on 0343 222 1234 and posting it to '**FREEPOST TFL FEEDBACK**' (no stamp required).

Please return all questionnaires no later than the **9 January 2015**

## More Information

You can learn more and respond to the consultation online by visiting the TfL website: <http://www.tfl.gov.uk/ultra-low-emission>

This information includes:

- Supplementary information
- Impact assessment (including impacts on equalities)
- Variation Order for the proposed charging scheme

To request a copy in Braille or large-text, please call us on 0343 222 1234\* or email us at [consultations@tfl.gov.uk](mailto:consultations@tfl.gov.uk)

\* Service and network charges may apply

## What happens next?

The consultation will close on 9 January 2015.

TfL will analyse the results of the consultation and make a recommendation to the Mayor. The Mayor will then make a decision on whether to confirm the scheme order, with or without modifications. As the licensing authority for London's taxi and private hire vehicles, TfL will decide whether to make changes to the licensing requirement for these. TfL will publicise this decision, along with the reasons behind the decision.

Should the ULEZ proposal be taken forward, the next steps in the process would be:

- 2015 – Legal order and policies confirmed
- 2015-2020 – An information campaign would take place to help ensure that drivers and operators are aware of the ULEZ standards and understand their options before they are enforced from 2020
  - Number of hybrid and zero emission buses in the ULEZ increase
- 2018 – All newly licensed taxis and new PHVs would be required to be zero emission capable

- September 2020 – Reduction in the age limit for all non-zero emission capable taxis from 15 to 10 years (irrespective of date of licensing)
- September 2020 – ULEZ standards are introduced and all double-deck buses hybrid / single-deck buses zero emission
- September 2023 – Residents' discount expires

Thank you for your participation

## Appendix F: Stakeholder meetings

The consultation ran from 27 October 2014 to 9 January 2015. This list includes meetings which took place before, during and after the consultation period. Meetings specifically with taxi and PHV trade organisations are listed in Appendix I.

| <b><i>Stakeholder</i></b>   | <b><i>Date</i></b> |
|---|--------------------|
| London Assembly Environment Committee   | February 2014      |
| Campaign for Clean Air  | February 2014      |
| Taxi Manufacturers  | March 2014         |
| P2W meeting   | April 2014         |
| Federation of British Historic Vehicles Clubs   | May 2014           |
| London Borough of Southwark   | May 2014           |
| Hydrogen Group - HyTEC  | May 2014           |
| Utilities Forum - HAUC  | May 2014           |
| Low Carbon Vehicle Partnership and Society of Motoring and Manufacturing Trade                            | June 2014          |
| London Boroughs of Kensington & Chelsea and Hammersmith & Fulham  | June 2014          |
| Car clubs   | June 2014          |
| Department of Transport   | June 2014          |
| Crossrail Logistics Meeting   | June 2014          |
| BVRLA (British Vehicle Renting and Leasing Association)   | June 2014          |
| Confederation of Passenger Transport, London Tourist Coach Operator and Original London Sightseeing tours | June 2014          |
| London Borough of Hackney   | June 2014          |
| London Borough of Lambeth   | June 2014          |
| NHS / Ambulance Service (not under GLA fleets)  | July 2014          |
| London Electric Vehicle Partnership   | July 2014          |
| Business Improvement Districts (BIDs)   | July 2014          |

| <b>Stakeholder</b>                                | <b>Date</b>           |
|---|-----------------------|
| Fire Brigade (under GLA Fleets)                   | July 2014             |
| Police (under GLA Fleets)                         | July and October 2014 |
| National Association of Wedding Car Professionals | September 2014        |
| Greater London Freight Council                    | October 2014          |
| London Travelwatch                                | October 2014          |
| TfL Freight Forum                                 | October 2014          |
| South East Freight Council Meeting                | October 2014          |
| London Councils / TEC                             | October 2014          |
| East of England Freight Council meeting           | October 2014          |
| Private Hire trade (PHV)                          | October 2014          |
| Taxi Trade  | October 2014          |
| Taxi drivers association (LTDA)                   | October 2014          |
| Cabbies Cabinet                                   | October 2014          |
| Central sub regional borough meeting              | October 2014          |
| Metropolitan Police                               | October 2014          |
| Abu Dhabi Department of Transport                 | November 2014         |
| Central London Freight Quality Partnership        | November 2014         |
| SMMT and DfT                                      | November 2014         |
| IDAG (Independent Disability Advisory Group)      | November 2014         |
| Bus Operator Forum                                | November 2014         |
| Central sub-regional forum on accessibility       | November 2014         |
| European Commission engagement workshop           | November 2014         |



| <b>Stakeholder</b>   | <b>Date</b>   |
|--|---------------|
| RB Kensington and Chelsea  | November 2014 |
| Various - ULEZ stakeholder breakfast briefing                                    | November 2014 |
| LB Enfield   | November 2014 |
| Autogas LPG  | November 2014 |
| London Strategic Forum (was Community Transport Association)                     | December 2014 |
| RAC Foundation   | December 2014 |
| London Assembly Environment Committee examination of ULEZ                        | December 2014 |
| Taxi Trade   | December 2014 |
| PHV trade  | December 2014 |
| DfT  | December 2014 |
| DEFRA  | December 2014 |
| Jaguar Land Rover  | December 2014 |
| Confederation of Passenger Transport   | December 2014 |
| UKLPG and Flogas   | December 2014 |
| Westminster City Council, LB Islington, RB Kensington and Chelsea and LB Hackney | December 2014 |
| City of London   | December 2014 |
| Motorcycle Action Group  | January 2015  |
| Confederation of Passenger Transport   | January 2015  |
| Low Vehicle Partnership Passenger Car Working Group meeting                      | January 2015  |
| Private Hire trade quarterly meeting   | January 2015  |
| London Council's political members   | February 2015 |
| Royal Borough of Greenwich   | February 2015 |
| Toyota   | February 2015 |

| <b><i>Stakeholder</i></b>           | <b><i>Date</i></b> |
|-------------------------------------|--------------------|
| Taxi Trade                          | February 2015      |
| PHV Trade                           | March 2015         |
| Taxi Trade                          | March 2015         |
| Express and Tourist coach operators | March 2015         |

## **Appendix G: Schedule of Variations**

# **Explanatory Note to the Greater London Low Emission Zone Charging (Variation and Transitional Provisions) Order 2014**

**Proposed variations to the Greater London Low Emission Zone Charging Order 2006 ("the Principal Order") which was made by Transport for London on 13 November 2006 and confirmed with modifications by the Mayor of London on 3 May 2007**

**The Principal Order was subsequently varied by the Greater London Low Emission Zone Charging (Variation) Order 2007 and the Greater London Low Emission Zone Charging (Variation) Order 2010**

## **Variations Proposed by Transport for London**

Following consideration of a number of issues associated with the operation of the Low Emission Zone, Transport for London made the Greater London Low Emission Zone Charging (Variation and Transitional Provisions) Order 2014 on 22 October 2014. The details and reasons for this proposed change are listed in this schedule and are subject to public consultation.

The schedule is divided into four columns:

- Column 1 is a reference number;
- Column 2 gives a short summary of the proposed variation;
- Column 3 gives an explanation of the proposed variation; and
- Column 4 sets out Transport for London's reasons for the proposed variation.

Transport for London will pass all representations and objections that are received with respect to the variations in this schedule by 9 January 2015 to the Mayor for consideration.

It is for the Mayor to consider whether or not to confirm the Variation Order as made by TfL, with or without modifications.

Transport for London  
27 October 2014

## Schedule of Variations

| Ref. no. | Summary of proposed variation      | Details of TfL's proposed variation  | TfL's reasons for proposed variation  |
|----------|------------------------------------|--|---|
| 1.       | <b>Designation of roads</b>        | <p>The Ultra Low Emission Zone (ULEZ) area would be defined by reference to the plans contained in Annex 1 to the Greater London (Central Zone) Congestion Charging Order 2004, as amended, which show the current Congestion Charging Zone (CCZ).</p> <p>The changes to introduce what would be, in effect, an inner ULEZ to the Low Emission Zone (LEZ) would come into effect on 7 September 2020.</p>  | <p>The CCZ covers areas where air pollution levels are consistently highest in London and where people experience the greatest exposure.</p> <p>Although Congestion Charging and the ULEZ have different purposes, the boundary of the CCZ is well understood by drivers and operators.</p>   |
| 2.       | <b>Relevant classes of vehicle</b> | <p>In addition to the classes of vehicle that are currently subject to the LEZ, the ULEZ requirements would also apply to cars (class M<sub>1</sub>) and Motorcycles (class L), which are non-compliant with the relevant emissions standard (and which are not non-chargeable).</p> <p>The following vehicle classes would therefore be subject to the ULEZ requirements:</p> <ul style="list-style-type: none"> <li>- <b>motorcycle &amp; moped</b> (class L)</li> <li>- <b>car &amp; small van</b> (classes M<sub>1</sub> &amp; N<sub>1</sub>(i))</li> <li>- <b>large van &amp; minibus</b> (classes N<sub>1</sub> (ii, iii) &amp; M<sub>2</sub>)</li> <li>- <b>HGV</b> (classes N<sub>2</sub>, N<sub>3</sub>)</li> <li>- <b>bus &amp; coach</b> (class M<sub>3</sub>)</li> </ul> | <p>Whilst cars' and motorcycles' contribution to air pollution is much less than heavier vehicles on an individual basis, they make up the majority of traffic entering the ULEZ (together with vans and minibuses). The corresponding emissions reduction from the likely impact on driver behaviour from making these vehicles subject to the ULEZ justifies their inclusion.</p> <p>Based on current calculations, the ULEZ would deliver a 51 per cent reduction in NO<sub>x</sub>, 64 per cent reduction in PM<sub>10</sub> exhaust and 15 per cent reduction in CO<sub>2</sub> from road transport in central London in 2020.</p> |

| Ref. no. | Summary of proposed variation  | Details of TfL's proposed variation   | TfL's reasons for proposed variation   |
|----------|--------------------------------|---|--|
| 3.       | <b>Non-chargeable vehicles</b> | <p>In addition to the types of vehicle that are currently non-chargeable for the purposes of the LEZ, licensed hackney carriages (taxis) would also be non-chargeable for the purposes of ULEZ.</p> <p>The following vehicles would therefore be non-chargeable for the purposes of the ULEZ requirements:</p> <ul style="list-style-type: none"> <li>- HM forces (and visiting forces) vehicles</li> <li>- vehicles being used for military purposes</li> <li>- historic vehicles</li> <li>- non-road going vehicles</li> <li>- showman's vehicles</li> <li>- taxis</li> </ul> | <p>TfL is working to reduce the emissions impact taxis and private hire vehicles through its role as the body that licenses taxi and private hire services in London.</p> <p>TfL is proposing that:</p> <ul style="list-style-type: none"> <li>- from January 2018, all vehicles presented for licensing as taxis must be 'zero emission capable', and</li> <li>- from 2020, the age limit for all regular diesel licensed taxis would be reduced from 15 years to 10 years (irrespective of the date of licensing).</li> </ul> <p>In view of these proposed additional requirements on taxis, they would be non-chargeable for the purposes of the ULEZ requirements.</p> |

| Ref. no. | Summary of proposed variation | Details of TfL's proposed variation  | TfL's reasons for proposed variation   |
|----------|-------------------------------|--|--|
| 4.       | <b>Emissions standards</b>    | <p>It is proposed the emissions standards for the ULEZ vehicle charging scheme would be based on Euro standards, as is currently the case for LEZ.</p> <p>From 7 September 2020, the relevant standards would be:</p> <ul style="list-style-type: none"> <li>- <b>motorcycle &amp; moped</b>                      <b>Euro 3</b></li> <li>- <b>car &amp; small van (petrol)</b>              <b>Euro 4</b></li> <li>- <b>car &amp; small van (diesel)</b>              <b>Euro 6</b></li> <li>- <b>large van &amp; minibus (petrol)</b>        <b>Euro 4</b></li> <li>- <b>large van &amp; minibus (diesel)</b>        <b>Euro 6</b></li> <li>- <b>HGV</b>    <b>Euro VI</b></li> <li>- <b>bus* &amp; coach</b>                              <b>Euro VI</b></li> </ul> <p>* Approximately 300 New Routemaster buses (which have NO<sub>x</sub> emissions much closer to the Euro VI standards than other Euro V buses) would continue without modification at 2020 and would therefore be subject to an emissions standard of 2.05g/km of NO<sub>x</sub>.</p> <p>The provisions relating to emissions standards for vehicles subject to the LEZ would also be 'tidied up' to reflect the fact that the implementation date of 3 January 2012 has passed and one set of standards is now applicable.</p> | <p>The Euro standards are a range of successive emissions standards for petrol, gas and diesel engines. New vehicles are tested to ensure they meet the emissions standards during the type approval process.</p> <p>There are national and European Union (EU) legal limits (limit values) for air pollutants which are designed to protect human health. The Mayor has made a commitment to reduce transport emissions and improve air quality in his Transport, Air Quality and Climate Change Mitigation Strategies; however, London does not currently meet limit values for nitrogen dioxide (NO<sub>2</sub>).</p> <p>Requiring vehicles that are subject to the ULEZ to meet relevant minimum standards or to pay a charge, aims to encourage a shift to lower emission vehicles and associated emissions reductions in the ULEZ.</p> <p>It is expected that the introduction of the ULEZ would halve air pollutant emissions from vehicle exhausts (PM<sub>10</sub> and NO<sub>x</sub>) and the number of people living with levels of NO<sub>2</sub> which exceed EU legal limits would reduce by 74% in central London, 50% in inner London and 42% in outer London.</p> <p>It is considered that the cost of retrofitting the Euro V New Routemasters to make them the equivalent to Euro VI (approximately £7m) would more effectively be spent on reducing emissions from buses outside the ULEZ.</p> |

| Ref. no. | Summary of proposed variation | Details of TfL's proposed variation  | TfL's reasons for proposed variation  |
|----------|-------------------------------|--|---|
| 5.       | <b>ULEZ charge</b>            | <p>From 7 September 2020, the proposed ULEZ daily charge for vehicles that do not comply with the relevant standards would be:</p> <ul style="list-style-type: none"> <li>- <b>motorcycle &amp; moped</b>      <b>£12.50</b></li> <li>- <b>car &amp; small van</b>            <b>£12.50</b></li> <li>- <b>large van &amp; minibus</b>        <b>£12.50</b></li> <li>- <b>HGV</b>                                <b>£100</b></li> <li>- <b>bus &amp; coach</b>                    <b>£100</b></li> </ul> <p>The ULEZ charge could be paid on the next charging day – no surcharge would be applied.</p> | <p>The level of charge was set following strategic assessment, including a cost-benefit analysis and the impact on each type of vehicle, with the aim of encouraging behaviour change and the corresponding emissions savings.</p> <p>It has been set at a level that enables those people making very infrequent trips to continue to do so if they do not want to change their vehicle.</p> |



| Ref. no. | Summary of proposed variation                  | Details of TfL's proposed variation  | TfL's reasons for proposed variation   |
|----------|--|--|--|
| 6.       | <b>Payment methods, refunds and amendments</b> | <ul style="list-style-type: none"> <li>▪ Changes would be made to introduce: <ul style="list-style-type: none"> <li>- The concept of 'period licences' i.e. being able to purchase the ULEZ charge for a period of time, without having to pay for each charging day separately.</li> </ul> <p>Those periods would be:</p> <ul style="list-style-type: none"> <li>Weekly (7 consecutive charging days)</li> <li>Monthly (31 consecutive charging days)</li> <li>Annual (365 consecutive charging days)</li> </ul> </li> <li>- The ability to purchase the ULEZ charge via ULEZ Auto Pay.</li> <li>- The ability to purchase the ULEZ charge via Fleet Auto Pay.</li> </ul> <p>(Payment by Auto Pay would operate in the same manner as it does for payment of the Congestion Charge.)</p> <ul style="list-style-type: none"> <li>▪ A refund of a ULEZ daily charge would not be permitted.</li> <li>▪ A refund of a ULEZ 'period licence' would be permitted.</li> <li>▪ A ULEZ daily charge or 'period licence' could be amended to apply to a different vehicle or a different date, subject to certain conditions.</li> </ul> | <p>The proposed introduction of additional payment methods for the ULEZ charge is intended to reflect the fact that a broader range of drivers are affected by ULEZ requirements than by the LEZ and that some vehicles may need to pay both the ULEZ charge and Congestion Charge on any given day.</p> <p>TfL would, however, prefer that drivers took action to comply with the ULEZ requirements rather than pay the charge (there is no option to comply in relation to Congestion Charging) and therefore does not propose to offer a 'discount' on the charge for payment by Auto Pay or Fleet Auto Pay.</p> <p>As the ULEZ charge would affect a broader range of drivers than the LEZ, it is considered less practical to allow refunds of daily charges. This is consistent with the approach taken to refunds of purchases of a daily Congestion Charge.</p> <p>A ULEZ daily charge could, however, be amended to apply to a different vehicle or a different date.</p> |

| Ref. no. | Summary of proposed variation           | Details of TfL's proposed variation  | TfL's reasons for proposed variation   |
|----------|---|--|--|
| 7.       | <b>Penalty charges</b>                  | <p>From 7 September 2022, if a vehicle that was not compliant with the relevant ULEZ standard entered the ULEZ and did not pay the requisite charge, the registered keeper of that vehicle would be liable for the following level of penalty charge, depending upon the vehicle type:</p> <ul style="list-style-type: none"> <li>- <b>motorcycle &amp; moped</b>     <b>£130</b> (reduced to £65 if paid within 14 days)</li> <li>- <b>car &amp; small van</b>         <b>£130</b> (reduced to £65 if paid within 14 days)</li> <li>- <b>large van &amp; minibus</b>     <b>£130</b> (reduced to £65 if paid within 14 days)</li> <li>- <b>HGV</b>                         <b>£1000</b> (reduced to £500 if paid within 14 days)</li> <li>- <b>bus &amp; coach</b>             <b>£1000</b> (reduced to £500 if paid within 14 days)</li> </ul> <p>If a penalty charge is not paid within 28 days of the date of service of the associated Penalty Charge Notice, it would be increased by 50%.</p> | The penalty charges have been set at a level that is proportionate to the ULEZ daily charge and which would discourage non-compliance with ULEZ requirements.  |
| 8.       | <b>Interpretation and Clarification</b> | New definitions would be added to the Scheme Order, and consequential provisions made where necessary.   | New definitions and amendments would be necessary in order to introduce a new charging area, additional relevant vehicle classes and new payment methods.  |
| 9.       | <b>Transitional Provisions</b>          | <p>Transitional provisions would provide for a sunset period, during which vehicles of residents that are registered with TfL for the 90% discount on the Congestion Charge would be treated as non-chargeable for the purposes of the ULEZ charge.</p> <p>This sunset period would commence on 7 September 2020 and end on 6 September 2023.</p>  | The proposed discount is to recognise the fact that those living within the ULEZ would be unable to avoid it and may require more time to change their vehicle for one to meet ULEZ emissions standards. |

## Appendix H: Analysis of late responses from public and business

TfL received 23 late responses to the ULEZ consultation. These were received via email as the consultation portal closed on 9 January 2015. A summary analysis is presented below.

| <b>Response</b>   | <b>No of late responses</b> |
|---|-----------------------------|
| <b>Supports the overall ULEZ proposals</b>  | 0                           |
| <b>Supports ULEZ but believes scheme should go further to improve air quality</b> | 0                           |
| <b>Supports the theory of improving air quality but does not support ULEZ</b>     | 5                           |
| <b>Opposes ULEZ</b>   | 6                           |
| <b>No comment or other comments</b>   | 12                          |

## Appendix I: Taxi and Private Hire Trade Meetings

### a) General Stakeholder Meetings:

- **14 November 2013** - General ULEZ stakeholder workshop to which representatives from the PHV trade were invited.
- **3 March 2014** – Follow up general ULEZ stakeholder workshop to which representatives from the PHV and taxi trade were invited.
- **25 November 2014** - Stakeholder breakfast briefing session hosted by TfL. Speakers included Michele Dix, TfL and Elliot Treharne, GLA. There were presentations on the Mayor's Air Quality Priorities and an overview on ULEZ proposals. There was also a Q&A panel session. Addison Lee, the Society of Motor Manufacturers and Traders, and Nissan were among the attendees.

### b) Taxi trade engagement:

- **16 January 2014** – Zero emission capable taxi press and stakeholder event with Karsan, Fraser Nash and LTC, which taxi trade was invited to. Taxi drivers were able to attend in the afternoon.
- **19 March** – Workshop with all taxi vehicle manufacturers where TfL presented the ULEZ proposals being considered.
- **15 May 2014** - Specific discussions with LTDA where TfL presented the ULEZ policy development and measures being considered (including reduction to age limit).
- **29 May 2014** – Workshop with the taxi trade associations and taxi fleet owners where TfL presented the ULEZ proposals being considered (including reduction to age limit).
- **13 October 2014** - Meeting with the taxi trade associations (led by Michele Dix) where TfL gave an insight into the consultation, subject to agreement from the Mayor on the reduced age limit.
- **10 December 2014** – Meeting with taxi trade with OLEV.
- **23 February 2015** – Meeting with taxi trade to discuss zero emission capable taxis, supporting infrastructure and funding and the financial impact of the reduced age limit on existing vehicle owners.
- **11 March 2015** – Meeting with the taxi trade to consider the independent economic and finance review of the current taxi vehicle market in London.

### c) Private Hire engagement

- **4 June 2014** - Specific workshop with the private hire trade representatives.
- **17 June** – Meeting with Green Tomatoes Cars.
- **23 July 2014** - Specific discussions with the PHV trade.

- **5 August 2014** – meeting with Addison Lee (as they were unable to attend the 4 June workshop).
- **8 September 2014** - Specific discussions with the PHV trade and vehicle manufacturers, including the Society of Motor Manufacturers and Traders.
- **11 December 2014** – Meeting with PHV trade and OLEV
- **16 October 2014** – Discussion with PHV trade regarding ULEZ consultation and specific private hire proposals. TfL agreed to the extension of the consultation from 5 to 9 January 2015.
- **27 October 2014** – At regular PHV / TfL quarterly meeting the trade said they were content with engagement to date and agreed to a future meeting to discuss funding once further details have been announced by the Government in December.
- **11 December 2014** - Meeting with PVH trade to discuss OLEV outcome.
- **29 January 2015** – Update to the Private Hire Trade quarterly meeting at City Hall.
- **4 March 2015** – Meeting with PHV trade to discuss availability of suitable zero emission capable vehicles and OLEV update.

## **Appendix J: Glossary of Terms**

### ***Climate Change Mitigation and Energy Strategy (CCMES)***

Sets out the policies and actions to achieve the vision for London to be one of the world's leading low carbon cities and to reduce London's CO<sub>2</sub> emissions by 60 per cent of 1990 levels by 2025.

### ***Conditions of Fitness (CoF)***

Taxi licensing requirements.

### ***Congestion Charge (CC)***

Refer to the Congestion Charge Zone (CCZ).

### ***Congestion Charge Zone (CCZ)***

The Congestion Charge Zone is an area of central London, bounded by the inner ring road. There is an £11.50 daily charge for driving a vehicle within the charging zone between 07:00 and 18:00, Monday to Friday.

### ***Department for Environment, Food and Rural Affairs (Defra)***

UK Government department responsible for policy and regulations on environmental, food and rural issues.

### ***Diesel Particulate Filter (DPF)***

A device designed to remove diesel particulate matter or soot from the exhaust gas of a diesel engine.

### ***Driver and Vehicle Licensing Agency (DVLA)***

The organisation of the UK government responsible for maintaining a database of drivers in Great Britain and a database of vehicles for the entire United Kingdom.

### ***Early adopters***

Vehicles which comply with the Euro standards specified in the ULEZ before that Euro standard becomes mandatory.

### ***Electric vehicle (EV)***

Also referred to as an electric drive vehicle, uses one or more electric motors or traction motors for propulsion. An electric vehicle may be powered through a collector system by electricity from off-vehicle sources, or may be self-contained with a battery or generator to convert fuel to electricity.

### ***Euro standards***

The European emissions standards, or Euro standards, are a range of successive exhaust emissions standards for petrol, gas and diesel engines, identified as Euro 4, Euro 5, Euro 6, Euro VI etc (Euro standards for heavy-duty diesel engines use Roman numerals and for light-duty vehicle standards use Arabic numerals). New vehicles are tested to ensure they meet the emissions standards during the type approval process. These standards are used by the existing London LEZ to ensure consistency across Europe.

### ***Geo-fencing***

TfL is investigating the possible use of geo-fencing technology. This uses GPS systems to create a virtual zone around a particular location which activates the electric mode of TfL hybrid vehicle buses with extended zero emission capability and other hybrid vehicles when they enter the ultra low emission zone or other zones. TfL are trialling this on hybrid buses. This can be configured to allow 'hard zones', where buses and certain vehicles/taxis must always run in electric mode and 'soft zones' where they run in electric mode if there is enough battery charge remaining.

Geo-fencing will enable TfL to target high pollution, difficult to treat areas. Where blanket London-wide measures are insufficient to tackle these special cases geo-fencing will allow TfL to manage pollution more effectively.

The technology could also extend to taxis although the lack of planned routing introduces difficulties in knowing when charging will be needed. Further research into the feasibility of taxis using geo-fencing is needed.

### ***Hybrid vehicle***

A vehicle that uses two or more distinct power sources to move the vehicle. The term most commonly refers to hybrid electric vehicles (HEVs), which combine an internal combustion engine and one or more electric motors.

### ***Integrated Impact Assessment (IIA)***

A method of estimating the possible implications, intended and unintended, of policies, plans, strategies, projects or initiatives. It examines how the proposal may affect communities and how these effects may be distributed amongst different groups within the community. The aim of IIA is to make recommendations to enhance potential positive outcomes and minimise negative impacts of a proposal.

### ***Late adopters***

Refers to vehicles which a number of manufacturers, usually of smaller and/or specialist vehicles, have been permitted to produce which meet a certain Euro standard past the mandatory date of the next Euro standard.

### ***Legal limits***

The European Union (EU) Ambient Air Quality Directive (2008/50/EC) and Directive 2004/107/EC set limits for concentrations of pollutants in outdoor air, which have been transposed into English law by the Air Quality (Standards) Regulations 2010. Also known as 'limit values'.

### ***Low Emission Zone (LEZ)***

The Low Emission Zone (LEZ) operates to encourage the most polluting heavy vehicles driving in London to become cleaner. The LEZ covers most of Greater London and is in operation 24 hours a day, 365 days of the year.

### ***LPG vehicles***

These vehicles are converted to run on liquefied petroleum gas (LPG). They are usually spark ignition (petrol) powered vehicles that have undergone an aftermarket conversion to run on a combination of petrol and LPG (Bi-fuel). This conversion does not change the type approval status of the base vehicle.

**Mayor's Air Quality Strategy (MAQS)**

Sets out actions to improving London's air quality and includes measures aimed at reducing emissions from transport, homes, workplaces and new developments.

**Mayor's Transport Strategy (MTS)**

The Mayor's transport strategy for London.

**New Routemaster (NRM)**

Bus with an advanced diesel-electric hybrid engine, much greater fuel efficiency and around half the CO<sub>2</sub> emissions and a quarter of the air pollutant emissions of a conventional bus.

**Nitrogen dioxide (NO<sub>2</sub>)**

An air pollutant that can affect lung function and can cause respiratory symptoms. There is a legal limit in place for NO<sub>2</sub>.

**Nitrogen oxide (NO<sub>x</sub>)**

Refers to total vehicle emissions (both those directly emitted and those formed by chemical reactions). Vehicle emissions standards refer to total NO<sub>x</sub> emissions but EU air quality limit values refer to ambient concentrations and are set for NO<sub>2</sub> as this is the harmful component of the emissions.

**Non-road mobile machinery (NRMM)**

Refers to mobile machines, transportable industrial equipment or vehicles which are fitted with an internal combustion engine and not intended for transporting goods or passengers on roads.

**Office for Low Emission Vehicles (OLEV)**

A team working across government to support the early market for ultra-low emission vehicles (ULEV).

**Particulate Matter (PM)**

Airborne particulate matter is made up of a collection of solid and/or liquid materials of various sizes. PM contains a range of chemical compounds and can adversely affect our health. There are legal limits in place for both PM<sub>10</sub> and PM<sub>2.5</sub>.

**PM<sub>10</sub>**

Particulate matter with particle size less than 10 micrometres in diameter and which are so small that they can get into the lungs, potentially causing serious health problems.

**PM<sub>2.5</sub>**

Particulate matter with particle size less than 2.5 micrometres in diameter (fine particles) and which are so small they can be detected only with an electron microscope. Sources of fine particles include all types of combustion, including motor vehicles, power plants, residential wood burning, forest fires, agricultural burning, and some industrial processes.



***Plug-in hybrid electric vehicle (PHEVs)***

PHEVs can operate in ZEC mode for longer than a pure electric (battery-only) vehicle. PHEVs have a (lithium-ion) battery that can be recharged overnight (and top-up, using fast-charge technology), to provide zero emission driving for up to circa 80km, after which the conventional engine is used.

***Private Hire Vehicle (PHV)***

Any vehicle that seats up to eight passengers and is available for hire with a driver requires a PHV licence (eg minicab). It is the responsibility of the vehicle owner to apply for a licence.

***Rapid charging***

A high power supply which can typically charge an electric vehicle in less than 30 minutes, as opposed to slow charging which is the most common method of charging electric vehicles with a full charge typically taking 6 to 8 hours.

***Retrofit***

Retrofit technology, such as the fitting of a filter, can be used to enable older vehicles to meet Euro standards that were mandatory for newer vehicles.

***Small and medium-sized enterprises (SMEs)***

As defined in EU law, the main factors determining whether a company is an SME are: number of employees and either turnover or balance sheet total.

***Society of Motor Manufacturers and Traders (SMMT)***

Exists to support and promote the interests of the UK automotive industry at home and abroad.

***Sunset period***

In recognition that residents in the zone would be unable to avoid the new standards, TfL proposed to provide residents with a three year sunset period to 6 September 2023 before any charges would be applied.

***Taxi (black cab)***

A specialist vehicle licensed by TfL to ply for hire in London. Most taxis are licensed to carry five passengers although some are licensed to carry six.

***Taxi and Private Hire (TPH)***

The office within TfL responsible for taxi and PHV licensing.

***Ultra Low Emission Vehicle (ULEV)***

The Department for Transport uses the term 'ultra-low emission vehicles' to refer to vehicles with significantly lower levels of tailpipe emissions than conventional vehicles. In practice, the term currently refers to electric, plug-in hybrid and hydrogen fuel-cell vehicles. Vehicles that use non-fossil fuel propulsion have zero tailpipe emissions. For other propulsion types, only vehicles with tailpipe emissions below 75 grams of CO<sub>2</sub> per kilometre are included.

### **Ultra Low Emission Zone (ULEZ)**

Proposed emissions standards to encourage the most polluting vehicles driving in London to become cleaner. The ULEZ is proposed to cover the same area as the CCZ and will operate 24 hours a day, 365 days of the year.

### **ULEZ exhaust emissions standards (the ULEZ standards)**

The ULEZ standards differ by vehicle type. Each vehicle must conform to the relevant Euro standard in order to drive in the ULEZ without paying the daily charge.

### **Variation Order (VO)**

An amendment to a Scheme Order, which is used to implement road user charging schemes in London (such as LEZ and ULEZ).

### **Vehicle and Operator Services Agency (VOSA)**

Was an executive agency of the Department for Transport. It has been replaced by the Driver and Vehicle Standards Agency (DVSA).

### **Zero emission bus**

A bus with zero tailpipe emissions (eg electric or hydrogen).

### **Zero emission capable (ZEC) PHV**

The following criteria was consulted on:

A pure electric or hybrid vehicle capable of running in zero emission (at the tailpipe) mode or for all or part of the time (maximum 50g/km CO<sub>2</sub>, minimum range 30 miles).

TfL is now recommending a change to:

A pure electric or hybrid vehicle capable of running in zero emission (at the tailpipe) mode or for all or part of the time, with either:

- ≤50g/km CO<sub>2</sub> and minimum zero emission range of 10 miles **or**
- >50g/km CO<sub>2</sub> and <75g/km zero emission range of 20 miles

### **Zero emission capable (ZEC) taxi**

A pure electric or hybrid vehicle capable of running in zero emission (at the tailpipe) mode or for all or part of the time (maximum 50g/km CO<sub>2</sub>, minimum range 30 miles).

## **Appendix K: IIA updated with changes to ULEZ**



## **Ultra Low Emission Zone**

# **Addendum to the Integrated Impact Assessment (October 2014)**

**March 2015**

**Document control sheet**

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| <b>Approved by</b>   | NAME<br><b>Roselle Bellion</b>   | As Project Manager I confirm that the above document(s) have been subjected to Jacobs' Check and Review procedure and that I <b>approve them for issue</b> | INITIALS<br><b>RB</b>       |
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# 1 Introduction

## 1.1 Overview

1.1.1 To help reduce emissions, specifically from road transport, the Mayor and Transport for London (TfL) have developed a proposal for an Ultra Low Emission Zone (the ULEZ) to be implemented in central London from 7 September 2020.

1.1.2 The following objectives for the ULEZ were proposed in line with the proposals set out in the Mayor's Transport Strategy:

- **reduce air pollutant emissions from road transport**, particularly those with greatest health impacts, to support Mayoral strategies and contribute to achieving compliance with European Union (EU) limit values;
- **reduce carbon dioxide (CO<sub>2</sub>) emissions from road transport**, to support Mayoral strategies and contribute to a London-wide reduction; and
- **stimulate the low emission vehicle market** by increasing the proportion of low emission vehicles and promoting sustainable travel.

1.1.3 The ULEZ underwent consultation between 27 October 2014 and 9 January 2015 (the ULEZ (as consulted)).

## 1.2 Integrated Impact Assessment

1.2.1 TfL commissioned Jacobs in May 2014 to undertake an Integrated Impact Assessment (IIA) of the ULEZ (as consulted) to identify and articulate key impacts associated with its implementation. The IIA looked at a range of impacts on the environment, health, equality groups and London's economy in 2020 and 2025 and was supported by the following individual technical assessments:

- *Environmental Assessment;*
- *Health Impact Assessment;*
- *Equality Impact Assessment; and*
- *Economic and Business Impact Assessment.*

1.2.2 The IIA was considered critical by TfL to assist with identifying how negative impacts could be avoided, mitigated or remedied, and how positive impacts could be enhanced.

1.2.3 The IIA was completed in October 2014 and is available online through TfL's ULEZ consultation website, along with the associated technical assessments: <https://consultations.tfl.gov.uk/environment/ultra-low-emission-zone>

1.2.4 Following consultation on the ULEZ, and taking into account additional analysis and stakeholder engagement, TfL is proposing two changes to the ULEZ (as consulted).

1.2.5 Jacobs has undertaken an assessment of the proposed changes and the findings of the assessment are presented in this report. This report will be appended to TfL's briefing note to the Mayor in support of the proposed changes and should be read in conjunction with the IIA (October 2014).

### **1.3 Structure of this report**

1.3.1 Chapter 2 provides background information on the ULEZ (as consulted) and the proposed changes.

1.3.2 Chapters 3 and 4 provide information on the potential changes and an assessment of these changes.

1.3.3 Chapter 5 provides a summary of the assessment.

1.3.4 Chapter 6 lists the acronyms used throughout this report.



2.1 The ULEZ (as consulted)

2.1.1 The ULEZ (as consulted) comprises the following key requirements:

- **TfL buses:** investment in the TfL bus fleet so that all double decker buses operating in central London will be hybrid and all single deck buses will be zero emission capable (at source) by 2020;
- **taxis (black cabs) and Private Hire Vehicles (PHVs):** a requirement that all taxis and PHVs presented for licensing for the first time from 1 January 2018 would need to be zero emission capable alongside an accompanying reduction in the age limit for all non-zero emission capable taxis from 7 September 2020 from 15 to 10 years (irrespective of date of licensing); and
- **emission standards for vehicles (the ULEZ standards):** to encourage the uptake of cleaner vehicles, from 7 September 2020 vehicles that do not meet ULEZ emissions standards would be required to pay a daily ULEZ charge to drive within the ULEZ area.

2.1.2 The ULEZ emissions standards for all types of vehicles are set out in Table 2-1 and would operate for 24 hours a day, seven days a week. The geographical scope of the ULEZ would be enforced within the limits of the current Congestion Charge Zone (CCZ), which covers the City of London in its entirety (aside from a small area near to Tower Hill), and covers to varying extents, the City of Westminster and the London boroughs of Camden, Hackney, Islington, Lambeth, Southwark and Tower Hamlets. This area also experiences the highest levels and concentrations of pollution within London, to which the greatest number of people are exposed.

| Vehicle name           | Description  | Proposed emission standard | Date when manufacturers must sell new vehicles meeting the emission standards | Charge if not compliant |
|------------------------|--|----------------------------|---|-------------------------|
| Motorcycle, moped etc. | Any motorcycle or moped (tricycle or quadricycle)  | Euro 3                     | From July 2007  | £12.50                  |
| Car and small van      | A passenger vehicle with no more than 8 seats in addition to the driver's seat. A goods vehicle with weight when empty less than 1,205kg                 | Euro 4 (petrol)            | From 1 January 2008   | £12.50                  |
|                        |  | Euro 6 (diesel)            | From 1 September 2015   |                         |
| Large van and minibus  | Goods vehicle with a gross weight of 3.5 tonnes or less. Passenger vehicle with more than 8 passenger seats and gross vehicle weight of 5 tonnes or less | Euro 4 (petrol)            | From 1 January 2007   | £12.50                  |
|                        |  | Euro 6 (diesel)            | From 1 September 2016   |                         |
| HGV                    | Lorries and specialist vehicles of more than 3.5 tonnes gross vehicle weight   | Euro VI                    | From 1 January 2014   | £100.00                 |
| Bus / coach            | Passenger vehicles with more than 8 passenger seats of more than 5 tonnes gross vehicle weight   | Euro VI                    | From 1 January 2014   | £100.00                 |

**Table 2-1 The ULEZ standards** (source: TfL, 2014)

## 2.2 The ULEZ (with proposed changes)

2.2.1 TfL is proposing two changes to the ULEZ (as consulted) which relate to:

- *historic vehicles (Change 1); and*
- *all vehicles adapted for disability needs (Change 2).*

2.2.2 Details on the requirements of the ULEZ (as consulted), together with details on the requirements of the ULEZ (with proposed changes), are set out in Table 2-2. The proposed changes are highlighted in bold.

2.2.3 An assessment of the impact of these two changes is provided in **Section 3** and **Section 4**.

| Vehicle                                | ULEZ requirement (as consulted)   | The ULEZ requirement (with proposed changes) (change highlighted in bold)  | Change being assessed in this report  |
|--|---|--|---|
| Pre-1973 vehicles and historic vehicle | <ul style="list-style-type: none"> <li>Vehicles that are manufactured pre-1973 do not have to comply with the ULEZ requirements or standards</li> </ul> | <ul style="list-style-type: none"> <li>Vehicles that are manufactured pre-1973 do not have to comply with the ULEZ requirements or standards</li> <li><b>Vehicles that are 'historic vehicles' as defined by the Driver and Vehicle Licensing Agency (DVLA) do not have to comply with the ULEZ requirements or standards</b></li> </ul> | <p>Whether the increase in the number of vehicles that will be exempt from the ULEZ requirements and standards would reduce or remove any impacts identified in the IIA (October 2014)</p> <p>Referred to as <b>Change 1</b></p>          |
| Vehicles adapted for disability        | <ul style="list-style-type: none"> <li>No concession for vehicles adapted for disability</li> </ul>   | <ul style="list-style-type: none"> <li><b>3 year sunset period from the ULEZ charge for vehicles adapted for disability (i.e. disabled and disabled passenger vehicle tax class)</b></li> </ul>  | <p>Whether the provision of a 3 year sunset period from the ULEZ charge for those vehicles adapted for disability needs would reduce or remove any impacts identified in the IIA (October 2014)</p> <p>Referred to as <b>Change 2</b></p> |

**Table 2-2 Proposed changes to the ULEZ**

***Provide exemption for historic vehicles as defined under the Driver and Vehicle Licensing Agency’s (DVLA) definition of historic vehicles***

**3.1 Background**

- 3.1.1 The ULEZ (as consulted) does not include requirements or apply standards to vehicles manufactured pre-1973.
- 3.1.2 The DVLA provide tax exemptions for ‘historic vehicles’ which are current defined as vehicles built before 1 January 1974 where it is a qualifying vehicle listed in Table 3-1<sup>1</sup>. With effect from 1 April 2015, the Government will change the definition of an historic vehicle to include vehicles constructed before 1 January 1975 (as announced at Budget 2014).

| Vehicle                             | DVLA definition  |
|-------------------------------------|--|
| Private or light goods vehicles     | Private motor cars; goods vehicles not more than 3,500kg revenue weight; vehicles used for “private” (non-trade or business) purposes (including 3 wheeled vehicles over 450kg unladen). Includes buses used for voluntary, community or other non-profit-making purposes. |
| Motorcycles and tricycles           | Motor bicycles and motor cycles not exceeding 450kg unladen.   |
| Private Heavy Goods Vehicles (HGVs) | Goods vehicles, with a revenue weight in excess of 3,500kg, used privately. Does not include vehicles designed for, or adapted for, transporting goods on a public road for business purposes, including HGVs used for driver training or testing purposes.                |
| Special vehicles                    | Includes mobile crane, mobile pump, digging machine, works truck, road roller. Excludes showman’s HGV and showman’s haulage vehicles.  |
| Haulage vehicles                    | Vehicles which are constructed and used solely for haulage.  |
| Special concessionary               | Includes agricultural machines, mowing machines, snowploughs, gritting vehicles, electric vehicles and steam vehicles.   |

**Table 3-1** Definition for types of vehicles that can be ‘historic’ pending age (source: Driver & Vehicle Licensing Agency, 2014)

- 3.1.3 Change 1 would align with the DVLA’s tax exemption for historic vehicles.

**3.2 Baseline for assessment of change**

- 3.2.1 The DVLA update their definition of what constitutes a historic vehicle each year.
- 3.2.2 For the purposes of this assessment, it is assumed that the DVLA will change their definition of what constitutes a historic vehicle every year up until 2025<sup>2</sup>, as provided for in Table 3-2.

<sup>1</sup> Information obtained from Form INF34: Taxing historic vehicles. Accessed on 5 February 2015 from: <https://www.gov.uk/government/publications/inf34-taxing-historic-vehicles>

<sup>2</sup> A change in definition for historic vehicle up to 2025 has been assumed as the IIA (October 2014) includes an assessment of impacts for 2020 and 2025.

| Timeframe (year) | Assumed DVLA definition of historic vehicle |
|------------------|---|
| 2014             | Vehicles built before 1 January 1974        |
| 2015             | Vehicles built before 1 January 1975        |
| 2016             | Vehicles built before 1 January 1976        |
| 2017             | Vehicles built before 1 January 1977        |
| 2018             | Vehicles built before 1 January 1978        |
| 2019             | Vehicles built before 1 January 1979        |
| <b>2020</b>      | <b>Vehicles built before 1 January 1980</b> |
| 2021             | Vehicles built before 1 January 1981        |
| 2022             | Vehicles built before 1 January 1982        |
| 2023             | Vehicles built before 1 January 1983        |
| 2024             | Vehicles built before 1 January 1984        |
| <b>2025</b>      | <b>Vehicles built before 1 January 1985</b> |

**Table 3-2 Assumed DVLA changing definition of historic vehicle**

3.2.3 TfL data for the number of registered vehicles entering the CCZ in 2014, which totalled 6,096,676, provides that for the ULEZ (as consulted) there were 2,926 vehicles which were manufactured pre-1973. The same data provides that, if the definitions of what constitutes a historic vehicle as per Table 3-2 are adopted by DVLA, there would be:

- for the ULEZ with Change 1, in 2020 – 7,755 historic vehicles exempt from complying with the ULEZ; and
- for the ULEZ with Change 1, in 2025 – 11,725 historic vehicles exempt from complying with the ULEZ.

### 3.3 Assessment of change

3.3.1 The relevant impacts from the IIA (October 2014) on air quality and health are copied in Table 3-3.

| Relevant impacts identified in the IIA (October 2014)  | Scale of original impact |
|--|--------------------------|
| Air quality improvements in nitrogen dioxide (NO <sub>2</sub> ) concentrations in 2020 and 2025  | Major positive long term |
| Air quality improvements in particulate matter (PM <sub>2.5</sub> ) concentrations and PM <sub>10</sub> emissions in 2020 and 2025   | Minor positive long term |
| Reduction in the number of people living in areas above NO <sub>2</sub> annual limit value in 2020 and 2025  | Major positive long term |
| Reduction in the number of care homes, hospitals and schools in areas exceeding the NO <sub>2</sub> Air Quality Objectives (AQOs) across London (greatest in central London) | Major positive long term |

**Table 3-3 Impacts from the IIA (October 2014) for air quality and health relevant to Change 1**

**Assessment:**

**Whether the increase in the number of vehicles that will be exempt from the ULEZ requirements and standards will result in worsened air quality and health benefits from those identified in the IIA (October 2014)**

3.3.2 A comparison between the number of vehicles that were excluded from the ULEZ (as consulted) compared with the number of vehicles that would be excluded from the ULEZ (with Change 1) is shown in Table 3-4.

| Category   | Number of pre-1973 or historic vehicles entering the CCZ in 2014 | Percentage (%) of total number of vehicles entering the CCZ in 2014 |
|--|--|---|
| The ULEZ (as consulted) – vehicles manufacture pre-1973      | 2,926  | 0.05  |
| The ULEZ 2020 with Change 1 – vehicles manufactured pre-1980 | 7,755  | 0.13  |
| The ULEZ 2025 with Change 1 – vehicles manufactured pre-1985 | 11,725   | 0.19  |

**Table 3-4 The ULEZ (as consulted) compared to ULEZ with Change 1 (source: TfL, 2014)**

3.3.3 Table 3-4 does not account for frequency of vehicle entry into the CCZ. Revised figures using TfL data on the number and count of vehicles entering the CCZ in 2014 is shown in Table 3-5.

| Category   | Number of pre-1973 or historic vehicles entering the CCZ in 2014 | Percentage (%) of total number of vehicles entering the CCZ in 2014 | Revised percentage (%) accommodating frequency of entry to the CCZ in 2014 |
|--|--|---|--|
| The ULEZ (as consulted) – vehicles manufacture pre-1973      | 2,926  | 0.05  | 0.02   |
| The ULEZ 2020 with Change 1 – vehicles manufactured pre-1980 | 7,755  | 0.13  | 0.03   |
| The ULEZ 2025 with Change 1 – vehicles manufactured pre-1985 | 11,725   | 0.19  | 0.04   |

**Table 3-5 Revised figures for assessment accommodating frequency of entry into the CCZ**

3.3.4 Having regard to the revised percentages in Table 3-5, the number of vehicles that would not be required to comply with the ULEZ, as a result of Change 1, would increase by 0.01 per cent for each year of assessment. This increase is insignificant in terms of assessing changes to air quality and health benefits.

3.3.5 This percentage increase would also be influenced (reduced) by the scrappage of vehicles over time. As the data used to determine the number of historic vehicles that will be entering the CCZ / the ULEZ in 2020 and 2025 is not available at this time, the figures provided in Table 5-4 and Table 5-5 are based on the frequency of entry data in the year 2014) and do not factor this in.

3.3.6 Assuming some scrappage of historic vehicles between 2014 and 2020 and 2020 and 2025, the percentage increase of 0.01 per cent provides a worst case scenario.

### **3.4 Summary and conclusion**

3.4.1 Change 1 would mean that, at a worst case scenario, an additional 0.01 per cent of vehicles would be excluded from complying with the ULEZ requirements and standards.

3.4.2 In reality it would be less than this, as some historic vehicles would be scrapped over time.

3.4.3 This small percentage increase would not result in any change or removal of the air quality and health benefits mentioned in the IIA (October 2014).

***Introduce 3 year sunset period for vehicles adapted for disability needs (i.e. disabled and disabled passenger vehicle tax class)***

**4.1 Background**

4.1.1 The ULEZ (as consulted) does not provide any concession for owners of vehicles used by a disabled person, including cars and disabled passenger vehicles (e.g. adapted PHVs and minibuses), except for those who reside within the CCZ and therefore can apply for the residents sunset period.

4.1.2 The IIA (October 2014) found that the lack of provision of a concession for owners of vehicles used by a disabled person would:

- *potentially result in a reduction in supply of fully accessible taxis / adapted PHVs;*
- *potentially impact the ability of disabled people to access recreational and social activities from use of community transport vehicles, where these are operated and funded on a charitable or voluntary basis should the costs of complying with the ULEZ render these services unviable or place additional costs on the users;*
- *potentially be more difficult for disabled persons to find an alternative mode of accessible transport to central London.*

4.1.3 The IIA (October 2014) identified that these impacts would be offset by existing complementary policies, which work towards improving accessibility to London’s transport for all.

4.1.4 The purpose of this assessment for Change 2 is to identify whether the provision of a concession for disabled people that aligns with the existing vehicle tax exemption for disabled people would help to reduce these impacts.

**4.2 Baseline for assessment of change**

4.2.1 The DVLA currently provide a vehicle tax exemption for:

- *vehicles used by a disabled person; and*
- *disabled passenger vehicles.*

4.2.2 Vehicles used by a disabled person include owners of those vehicles who are entitled to the:

- *higher rate mobility component of Disability Living Allowance;*
- *enhanced rate mobility component of Personal Independence Payment;*  
*or*
- *War Pensioner’s Mobility Supplement.*



The vehicle must be registered in the disabled person’s name or their nominated driver’s name<sup>3</sup>.

4.2.3 Disabled passenger vehicles include those vehicles used by organisations providing transport for the disabled (apart from ambulances). For the purposes of this assessment, they include those PHVs, minibuses and coaches that are adapted and provide services to disabled people.

4.2.4 Taxis (which are all wheelchair accessible) and the Dial-a-Ride fleet are excluded from the assessment for the following reasons:

- *the ULEZ charge does not apply to taxis; and*
- *TfL will ensure the Dial-a-Ride fleet complies with the ULEZ requirements within the required timeframes.*

4.2.5 TfL data on the number of vehicles that entered the CCZ in 2014 provides information on the number of vehicles adapted for disability. Specifically it shows that:

- *approximately 150,000 vehicles entering the CCZ are vehicles used by a disabled person, of which 98 per cent are cars; and*
- *approximately 2,900 vehicles entering the CCZ are disabled passenger vehicles, of which 67 per cent are vans/minibuses.*

4.2.6 The majority of vehicles (cars) used by a disabled person are leased under the Motability scheme, typically for a three year period.

4.2.7 A high proportion of disabled passenger vehicles are local authority or community transport vehicles providing accessible transport for disabled clients, children and older people. A recent survey by the Community Transport Association found that of the vehicles operated in the sector 91% are owned by the operator and 7% are leased<sup>4</sup>.

**4.3 Assessment of change**

4.3.1 The relevant impacts from the IIA (October 2014) for disable people are copied in Table 4-1.

| Relevant impacts identified in the IIA (October 2014)   | Scale of original impact |
|---|--------------------------|
| It may be more difficult for disabled persons to find alternative modes of accessible transport to central London.  | Minor short-medium term  |
| ULEZ may result in a reduction in supply of fully accessible taxis / adapted PHVs.  | Minor short-medium term  |
| Increased cost of access to central London by minibus may have differential impact on those groups reliant on charitable or voluntary services (e.g. disabled, older people, faith groups). | Minor short-medium term  |

**Table 4-1 Impacts from the IIA (October 2014) for equality groups relevant to Change 2**

<sup>3</sup> UK Government. (2014). *Financial help if you're disabled*. Accessed on 13 February 2015 from: <https://www.gov.uk/financial-help-disabled/vehicles-and-transport>

<sup>4</sup> A CTA State of the Sector Report (CTA, 2014).

**Assessment:**

**Whether the provision of a three year sunset period from the ULEZ charge for those vehicles adapted for disability needs would reduce or remove the impacts on disabled people**

- 4.3.2 For owners of vehicles used by a disabled person and where adapted PHVs, minibuses and coaches are leased for use by a disabled person, Change 2 will provide them with an additional three years to upgrade their vehicles to comply with the ULEZ. This will aid in reducing costs for these owners and operators.
- 4.3.3 This will mean that the minor short-medium term impact identified for disabled people in relation to them finding alternative modes of transport would be removed.
- 4.3.4 The other two impacts identified in Table 4-1 would be reduced through Change 2, but not removed.

#### **4.4 Summary and conclusion**

- 4.4.1 Change 2 would result in the removal of one identified impact in the IIA (October 2014). The introduction of ULEZ with Change 2 would not make it more difficult for disabled persons to find alternative modes of accessible transport in central London in the short-medium term.
- 4.4.2 Existing policies relating to improving accessibility to London transport for all will help ensure that this is not an impact for the long term.
- 4.4.3 No other impacts identified in the IIA (October 2014) would be removed as a result of Change 2.

## 5 Summary and Conclusions

### 5.1 Summary of proposed changes

5.1.1 TfL is proposing two changes to the ULEZ (as consulted) as summarised in Table 5-1.

| Change no. | Description   |
|------------|---|
| 1          | Vehicles that are 'historic vehicles' as defined by the DVLA do not have to comply with the ULEZ standards or requirements.           |
| 2          | 3 year sunset period from the ULEZ charge for vehicles adapted for disability (i.e. disabled and disable passenger vehicle tax class) |

**Table 5-1 Summary of proposed changes to the ULEZ**

5.1.2 The adoption of Change 2 would result in the removal of one identified impact in the IIA (October 2014).

### 5.2 Changes to air quality impacts

5.2.1 The proposed changes do not result in any changes to the air quality impacts identified in the IIA (October 2014).

5.2.2 While Change 1 has the potential for more vehicles to be excluded from the ULEZ requirements and standards as a result of an increase in the historic vehicles entering the ULEZ, this percentage is expected to be minor.

### 5.3 Changes to health impacts

5.3.1 The proposed changes do not result in any changes to the health impacts identified in the IIA (October 2014).

### 5.4 Changes to impacts on equalities groups

5.4.1 Change 2 has the potential to lessen impacts on certain equality groups including women, the BAME and LGBT communities and disabled people.

5.4.2 The adoption of Change 2 would mean that the ability for disabled persons to find alternative modes of accessible transport in central London would not be more difficult in the short-medium term following the introduction of the ULEZ.

### 5.5 Changes to impacts on London's economy and SMEs

5.5.1 The proposed changes do not result in any changes to the impacts to the economy or SMEs as identified in the IIA (October 2014).

5.5.2 A summary of the changes to impacts identified in the IIA (October 2014) and discussed within this report is provided in Table 5-2.

| Relevant impacts identified in the IIA (October 2014)   | Scale of original impact | Relevant change assessed (no.) | Change to impact scale of impact |
|---|--------------------------|--------------------------------|----------------------------------|
| <b>Air quality and health impacts</b>   |                          |                                |                                  |
| Air quality improvements in nitrogen dioxide (NO <sub>2</sub> ) concentrations in 2020 and 2025   | Major positive long term | 1                              | No change                        |
| Air quality improvements in particulate matter (PM <sub>2.5</sub> ) concentrations and PM <sub>10</sub> emissions in 2020 and 2025  | Minor positive long term | 1                              | No change                        |
| Reduction in the number of people living in areas above NO <sub>2</sub> annual limit value in 2020 and 2025   | Major positive long term | 1                              | No change                        |
| Reduction in the number of care homes, hospitals and schools in areas exceeding the NO <sub>2</sub> Air Quality Objectives (AQOs) across London (greatest in central London)                | Major positive long term | 1                              | No change                        |
| <b>Equality impacts</b>   |                          |                                |                                  |
| It may be more difficult for disabled persons to find alternative modes of accessible transport to central London.  | Minor short-medium term  | 2                              | Removed                          |
| ULEZ may result in a reduction in supply of fully accessible taxis / adapted PHV.   | Minor short-medium term  | 2                              | Reduced impact                   |
| Increased cost of access to central London by minibus may have differential impact on those groups reliant on charitable or voluntary services (e.g. disabled, older people, faith groups). | Minor short-medium term  | 2                              | Reduced impact                   |

**Table 5-2 Summary of changes to the impacts identified in the IIA (October 2014) for the ULEZ (with proposed changes)**

|                 |  |
|-----------------|--|
| BAME            | Black, Asian, Minority Ethnic          |
| CCZ             | Congestion Charging Zone               |
| CO <sub>2</sub> | Carbon Dioxide                         |
| DVLA            | Driver and Vehicle Licensing Agency    |
| EU              | European Union                         |
| HGV             | Heavy Good Vehicle                     |
| IIA             | Integrated Impact Assessment           |
| LGBT            | Lesbian, Gay, Bisexual and Transgender |
| LGV             | Light Goods Vehicle                    |
| LV              | Limit Value                            |
| NO <sub>2</sub> | Nitrogen Dioxide                       |
| NO <sub>x</sub> | Nitrogen Oxide                         |
| OLEV            | Office for Low Emission Vehicles       |
| PHV             | Private Hire Vehicle                   |
| PM              | Particulate Matter                     |
| TfL             | Transport for London                   |
| ULEZ            | Ultra Low Emission Zone                |

Department for Transport. (2013). *Taxi and private hire vehicle statistics: England and Wales 2013*. Sourced from Taxi Licensing Authorities, August 2013. Accessed on 12 February 2015 from: <https://www.gov.uk/government/statistics/taxi-and-private-hire-vehicle-statistics-england-and-wales-2013>

Driver & Vehicle Licensing Agency. (2014). *Notes about Tax Classes*. V355/1. Accessed on 17 February 2015 from: [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/360119/V355X1\\_140714.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/360119/V355X1_140714.pdf)

Transport for London (TfL). (2014). *Newly Licensed Private Hire Vehicles – Hybrid Vehicles*. Notice 17/14. Issued 23 December 2014.

Transport for London (TfL). (2014). *Ultra Low Emission Zone – Supplementary Report*. Accessed from: [https://consultations.tfl.gov.uk/environment/ultra-low-emission-zone/user\\_uploads/ulez-supplementary-information---final-291014.pdf-1](https://consultations.tfl.gov.uk/environment/ultra-low-emission-zone/user_uploads/ulez-supplementary-information---final-291014.pdf-1)

Transport for London (TfL). (2013-2014). *Taxi and Private Hire Licensee Customer Satisfaction Survey 2013/14*.

Transport for London (TfL). (2013). *Taxi Fares and Tariffs Consultation*. Transport for London, London Taxi and Private Hire. 23 October 2013.

## Appendix L: Public and business free text analysis

This table is the full analysis of responses to Question 25.

| Theme   | Comment  | Open comments from all respondents | Percentage  |
|---|--|------------------------------------|-------------|
| <b>Air Quality in London</b>  | <b>Total</b>   | <b>1084</b>                        | <b>7%</b>   |
|   | Agrees it is important to do something about AQ in London  | 692                                | 4%          |
|   | ULEZ will be costly and won't achieve legal limits (congestion charge has not had the desired impact)                        | 208                                | 1%          |
|   | Comments on London's air quality/concern that pollutants from other zones are blowing into central London                    | 96                                 | 1%          |
|   | Other countries across the world produce much higher emissions than London   | 65                                 | 0%          |
|   | ULEZ is needed to curb pollution ahead of current/proposed large transport schemes which cause congestion/increase pollution | 4                                  | 0%          |
|   | Other comment regarding Air Quality  | 19                                 | 0%          |
|   | <b>Principle of a ULEZ</b>   | <b>Total</b>                       | <b>3403</b> |
| Objective to raise revenues/another tax on motorists  |  | 1589                               | 10%         |
| Support a ULEZ - unspecific comment   |  | 807                                | 5%          |
| Support the theory of lowering emissions but do not support another charge  |  | 192                                | 1%          |
| Oppose EU directives  |  | 174                                | 1%          |
| ULEZ not necessary - EU policy on new vehicles will ensure gradual emission reduction   |  | 131                                | 1%          |
| Oppose a ULEZ - unspecific comment  |  | 119                                | 1%          |
| Why just in London? The standards should be introduced nationally or not at all   |  | 103                                | 1%          |
| Supports but ULEZ should go further than it does (standards, size etc)  |  | 90                                 | 1%          |
| Difference in emission levels is not significant enough between Euro V & VI to write off older vehicles. Unfair to reduce the working life of the current fleet |  | 55                                 | 0%          |
| Oppose age vehicle age limits   |  | 51                                 | 0%          |
| ULEZ will drive forward technological advancements and green economy  |  | 43                                 | 0%          |
| Government should focus on more pressing issues   |  | 21                                 | 0%          |
| The people who benefit from these proposal should have to pay (residents, pedestrians, etc)   |  | 13                                 | 0%          |

| Theme                             | Comment   | Open comments from all respondents | Percentage |
|-----------------------------------|---|------------------------------------|------------|
|                                   | ULEZ is politically motivated   | 11                                 | 0%         |
|                                   | Other comment regarding the principle of a ULEZ   | 4                                  | 0%         |
| <b>Vehicle emission standards</b> | <b>Total</b>  | <b>1039</b>                        | <b>6%</b>  |
|                                   | ULEZ should be for commercial and public vehicles only  | 284                                | 2%         |
|                                   | Do not allow non compliant vehicles into the scheme area - no need to introduce another charge                            | 271                                | 2%         |
|                                   | Does not reflect life cycle of vehicles   | 169                                | 1%         |
|                                   | Heavy vehicles must be included   | 49                                 | 0%         |
|                                   | Standards should be higher than proposed  | 45                                 | 0%         |
|                                   | Make the compliance standards more stringent  | 43                                 | 0%         |
|                                   | Only zero emission vehicles should be allowed in the zone free of charge (not zero emissions capable vehicles) (taxi/phv) | 40                                 | 0%         |
|                                   | Age of diesel vehicle requirement should be increased - 5 years is too short  | 38                                 | 0%         |
|                                   | Non TfL-bus / coach comment   | 23                                 | 0%         |
|                                   | Other comments regarding vehicles/ emissions standards  | 19                                 | 0%         |
|                                   | HGV comment   | 18                                 | 0%         |
|                                   | Private car comment   | 12                                 | 0%         |
|                                   | Comment about retrofit  | 11                                 | 0%         |
|                                   | Vans (LGVs) comment   | 9                                  | 0%         |
|                                   | Consider allowing older private vehicles that have been re-engined into the zone charge-free                              | 6                                  | 0%         |
|                                   | Age of HGV requirement should be increased - 6 years is too short   | 2                                  | 0%         |
| <b>Boundary</b>                   | <b>Total</b>  | <b>1140</b>                        | <b>7%</b>  |
|                                   | Expand the boundary to cover a greater proportion of London   | 931                                | 6%         |
|                                   | Concern ULEZ will worsen conditions outside the zone  | 171                                | 1%         |
|                                   | Reduce the boundary   | 15                                 | 0%         |
|                                   | Boundary is correct as proposed   | 9                                  | 0%         |
|                                   | Other comment regarding the boundary  | 7                                  | 0%         |
|                                   | Boroughs on the edge of the zone should be given the option to opt in   | 7                                  | 0%         |
| <b>Timetable</b>                  | <b>Total</b>  | <b>797</b>                         | <b>5%</b>  |
|                                   | Implement ULEZ sooner   | 442                                | 3%         |
|                                   | Implement ULEZ later  | 177                                | 1%         |



| Theme                  | Comment   | Open comments from all respondents | Percentage |
|------------------------|---|------------------------------------|------------|
|                        | Standards should only apply to vehicles bought after ULEZ is confirmed, or after 2018. Retrospective policy is unfair | 117                                | 1%         |
|                        | Increase compliance standards as time goes on   | 38                                 | 0%         |
|                        | Other comment regarding the timetable   | 9                                  | 0%         |
|                        | Agrees with timetable as proposed   | 8                                  | 0%         |
|                        | Standards for HGV should be introduced sooner   | 6                                  | 0%         |
| <b>Operations</b>      | <b>Total</b>  | <b>819</b>                         | <b>5%</b>  |
|                        | Charge hours should be during the day only  | 345                                | 2%         |
|                        | Charge should be for weekdays only  | 274                                | 2%         |
|                        | Question about whether an individual's vehicle is compliant   | 68                                 | 0%         |
|                        | Other comment regarding operations  | 51                                 | 0%         |
|                        | Will/how will charge be collected from non-UK vehicles?   | 47                                 | 0%         |
|                        | How will charges be enforced should the vehicle owner do not comply/pay charge?                                       | 25                                 | 0%         |
|                        | Comment about making people aware of ULEZ, how to pay etc   | 9                                  | 0%         |
| <b>Level of charge</b> | <b>Total</b>  | <b>678</b>                         | <b>4%</b>  |
|                        | Set differential pricing according to level of emissions  | 180                                | 1%         |
|                        | Consider differential pricing according to frequency of travel/mileage travelled within the zone                      | 87                                 | 1%         |
|                        | Reduce the level of charge for light vehicles (cars, mini buses, vans and motorcycles)                                | 81                                 | 0%         |
|                        | Reduce the level of charge for motorcycles  | 68                                 | 0%         |
|                        | Differential charging for petrol/diesel vehicles  | 55                                 | 0%         |
|                        | Increase the level of charge for all vehicles   | 49                                 | 0%         |
|                        | Increase the level of charge for heavy vehicles (HGV, coaches and buses)  | 43                                 | 0%         |
|                        | Reduce the level of charge for heavy vehicles   | 38                                 | 0%         |
|                        | Other comment regarding the level of charge   | 30                                 | 0%         |
|                        | Increase the level of charge for light vehicles (cars, mini buses, vans and motorcycles)                              | 21                                 | 0%         |
|                        | Increase the level of charge for motorcycles  | 13                                 | 0%         |

| Theme   | Comment  | Open comments from all respondents | Percentage |
|---|--|------------------------------------|------------|
|   | Correct to do different charge levels as proposed  | 6                                  | 0%         |
| <b>Discounts and Exemptions</b>                                   | <b>Total</b>   | <b>2816</b>                        | <b>17%</b> |
|   | Oppose criteria for motorcycles - powered two wheelers should be exempt  | 1277                               | 8%         |
|   | Vintage/historic/classic vehicles should be exempt   | 535                                | 3%         |
|   | High impact on people with disabilities/attending hospital visits - Exemptions for wheelchair accessible vehicles/blue badge holders | 329                                | 2%         |
|   | Other discount and exemptions, including NHS and emergency service workers, elderly people, taxis (as small businesses)              | 156                                | 1%         |
|   | Residents should be exempt/receive 90% discount/receive x numbers of days a month free travel  | 122                                | 1%         |
|   | Petrol cars should be exempt   | 119                                | 1%         |
|   | There should be no exemptions  | 106                                | 1%         |
|   | Residents should not be exempt for an additional three years   | 61                                 | 0%         |
|   | Consider best way to treat motorist events, e.g. London to Brighton run  | 49                                 | 0%         |
|   | Residents just outside the boundary should also be exempt until 2023/receive discount  | 18                                 | 0%         |
|   | Black cabs should be exempt  | 17                                 | 0%         |
|   | PHVs should be exempt  | 12                                 | 0%         |
|   | LPG-powered vehicles should be exempt  | 11                                 | 0%         |
|   | Differential pricing for diesel and bio diesel cars  | 7                                  | 0%         |
| Exemptions for vehicles for which retrofit equipment not possible | 4  | 0%                                 |            |
| <b>TfL buses</b>  | <b>Total</b>   | <b>457</b>                         | <b>3%</b>  |
|   | Buses must be included/only buses should be included   | 232                                | 1%         |
|   | All buses entering the ULEZ should be zero emissions (capable)   | 114                                | 1%         |
|   | Standards for buses should be introduced sooner  | 39                                 | 0%         |
|   | Other comment regarding TfL buses  | 26                                 | 0%         |
|   | Why are buses exempt when they pollute more than taxis?  | 26                                 | 0%         |
|   | Comment on Euro V/ New Routemaster buses   | 13                                 | 0%         |
|   | TfL/Government shouldn't subsidise the cost of low emission buses  | 5                                  | 0%         |

| Theme                | Comment   | Open comments from all respondents | Percentage |
|----------------------|---|------------------------------------|------------|
|                      | Agrees with approach regarding TfL buses  | 2                                  | 0%         |
| <b>Taxis</b>         | <b>Total</b>  | <b>376</b>                         | <b>2%</b>  |
|                      | Impact on London's taxi trade   | 227                                | 1%         |
|                      | Set either zero emissions capable/low emissions or age limit, not both  | 69                                 | 0%         |
|                      | Other comment regarding taxis   | 36                                 | 0%         |
|                      | Only zero emission vehicles should be allowed to comply - not vehicles with zero emission capability            | 24                                 | 0%         |
|                      | Agrees with taxi proposals regarding Zero Emission Capable  | 16                                 | 0%         |
|                      | Agrees with taxi proposals regarding age limit  | 4                                  | 0%         |
| <b>Taxis PHVs</b>    | <b>Total</b>  | <b>572</b>                         | <b>4%</b>  |
|                      | Taxis/PHV must be included  | 404                                | 2%         |
|                      | Standards for taxis/PHV should be introduced sooner   | 72                                 | 0%         |
|                      | Extend the deadline for taxis and PHV to be zero emission capable beyond 2018                                   | 56                                 | 0%         |
|                      | Taxi/PHV driver recently upgraded their vehicle in line with current policy, could these people be compensated? | 28                                 | 0%         |
|                      | Support for 10 year age plan and zero emissions   | 12                                 | 0%         |
| <b>PHVs</b>          | <b>Total</b>  | <b>23</b>                          | <b>0%</b>  |
|                      | Other comment regarding PHVs  | 12                                 | 0%         |
|                      | PHVs should receive equal support as black cabs   | 7                                  | 0%         |
|                      | Agrees regarding Zero Emission Capable vehicles   | 3                                  | 0%         |
|                      | Disagrees regarding Zero Emission Capable vehicles  | 1                                  | 0%         |
| <b>Costs revenue</b> | <b>Total</b>  | <b>1035</b>                        | <b>6%</b>  |
|                      | High cost of buying new vehicles  | 349                                | 2%         |
|                      | Further increase to the cost of living/working in London - reduced quality of life                              | 305                                | 2%         |
|                      | Can't afford/doesn't want to buy a compliant vehicle for the policy requirements to change again in future      | 180                                | 1%         |
|                      | How will money resulting from the scheme be spent? How much is ULEZ expected to generate?                       | 144                                | 1%         |
|                      | Impacts residents' friends and family when they want to visit   | 27                                 | 0%         |

| Theme                                 | Comment  | Open comments from all respondents | Percentage |
|---------------------------------------|--|------------------------------------|------------|
|                                       | How will the proposals be funded?  | 20                                 | 0%         |
|                                       | Other comment regarding costs/revenue  | 6                                  | 0%         |
|                                       | Cost should be borne by residents of London across the city - not just of the zone   | 3                                  | 0%         |
|                                       | Need for government/EU support for the proposal  | 1                                  | 0%         |
| <b>Alternative policy suggestion</b>  | <b>Total</b>   | <b>1857</b>                        | <b>11%</b> |
|                                       | Give people financial aid to pay for new vehicles/rewards for buying new vehicles/set standards for new vehicles   | 280                                | 2%         |
|                                       | Increase road space for vehicles/optimize phasing of traffic lights/carry roadworks out at night/prevent 20mph zones/prevent idling to improve flow of vehicles to reduce congestion and emissions | 266                                | 2%         |
|                                       | Penalise/incentivise/work with manufacturers not users   | 202                                | 1%         |
|                                       | Other central government/GLA initiatives, avoiding another charge  | 139                                | 1%         |
|                                       | Ban lorries from central London during the day   | 111                                | 1%         |
|                                       | More policy to incentivise biggest contributors (e.g. taxis, buses, HGV) to buy cleaner vehicles (zero emission capable)   | 104                                | 1%         |
|                                       | Ban (private) vehicles from central London   | 100                                | 1%         |
|                                       | Diesel cars and buses  | 64                                 | 0%         |
|                                       | Reduce the number of buses in central London between the peaks   | 58                                 | 0%         |
|                                       | Change the requirements/price of the Congestion Charge/LEZ to tackle NO <sub>x</sub> issue   | 49                                 | 0%         |
|                                       | Tax cyclists/bring in cycling proficiency testing/improvements for cyclists are going to exacerbate traffic flow problems  | 47                                 | 0%         |
|                                       | Conduct road side emissions tests  | 47                                 | 0%         |
|                                       | Plant more trees/plants to help tackle pollution   | 16                                 | 0%         |
|                                       | Reduce the cost of parking at stations to encourage people to take the train into London   | 9                                  | 0%         |
|                                       | Ban tour buses   | 9                                  | 0%         |
| <b>Technology policy requirements</b> | <b>Total</b>   | <b>316</b>                         | <b>2%</b>  |
|                                       | No taxis/vans currently available that meet the requirements   | 300                                | 2%         |

| Theme                              | Comment   | Open comments from all respondents | Percentage |
|------------------------------------|---|------------------------------------|------------|
|                                    | Other comment regarding technology/policy requirements  | 11                                 | 0%         |
|                                    | Suggest offering a one off annual payment   | 5                                  | 0%         |
| <b>Infrastructure</b>              | <b>Total</b>  | <b>223</b>                         | <b>1%</b>  |
|                                    | Technology/infrastructure for electric cars is not mature/widespread enough to rely on/to afford  | 220                                | 1%         |
|                                    | Other comment regarding infrastructure  | 3                                  | 0%         |
| <b>Suggested supporting policy</b> | <b>Total</b>  | <b>686</b>                         | <b>4%</b>  |
|                                    | Improve public transport in/into London/reduce the cost of public transport/make public transport available 24 hours a day to reduce motor travel | 402                                | 2%         |
|                                    | Comment regarding improving and encouraging cycling/walking conditions  | 356                                | 2%         |
|                                    | Invest money in improving technology and infrastructure for green vehicles  | 124                                | 1%         |
|                                    | Other suggested supporting policy   | 49                                 | 0%         |
|                                    | Improve the availability of parking/delivery bays to prevent people driving around looking for spaces   | 31                                 | 0%         |
|                                    | Do more to tackle air quality in London   | 23                                 | 0%         |
|                                    | More should be done to encourage the uptake of petrol cars instead of diesel  | 22                                 | 0%         |
|                                    | There should be a proposal for a recycling/scrappage scheme - vehicles will be resold and pollute other areas of the country                      | 16                                 | 0%         |
|                                    | Speed limits - 20mph within ULEZ, 30 mph within M25   | 12                                 | 0%         |
|                                    | Enhance the LEZ (outside the ULEZ) to create a secondary tier of charge   | 7                                  | 0%         |
| <b>Impacts of a ULEZ</b>           | <b>Total</b>  | <b>3042</b>                        | <b>19%</b> |
|                                    | The scheme disproportionately impacts low and middle income people/will turn London into a city for the rich                                      | 671                                | 4%         |
|                                    | Cost impacts on customers/businesses  | 510                                | 3%         |
|                                    | High impact on small businesses   | 495                                | 3%         |
|                                    | Positive health implications (health of Londoners should take precedence over taxi operators, etc.)   | 389                                | 2%         |
|                                    | Consider the environmental impact of scrapping old vehicles & manufacturing new vehicles  | 267                                | 2%         |
|                                    | Not always practical or possible to use public transport/an alternative to driving  | 191                                | 1%         |

| Theme                          | Comment  | Open comments from all respondents | Percentage |
|--------------------------------|--|------------------------------------|------------|
|                                | Impact on tourism/leisure visits   | 172                                | 1%         |
|                                | Impact on London's economy   | 148                                | 1%         |
|                                | Poor timing when the UK economy is still fragile/in a time of austerity  | 104                                | 1%         |
|                                | Consider the environmental impact of manufacturing EVs and disposing of batteries at the end of EV life  | 32                                 | 0%         |
|                                | ULEZ will reduce the value of cars that people will need to sell on  | 27                                 | 0%         |
|                                | Pressure on used taxi market as drivers will be required to invest in new vehicles with zero emissions capability  | 23                                 | 0%         |
|                                | New cab sales will freeze until vehicle technology advances enough to be compliant with ULEZ requirements  | 6                                  | 0%         |
|                                | Charging more for heavy vehicles will encourage people to use more LGVs to make deliveries instead of HGVs, which will cause higher levels of pollution  | 4                                  | 0%         |
|                                | Other impacts of a ULEZ  | 3                                  | 0%         |
| <b>Comment on consultation</b> | <b>Total</b>   | <b>513</b>                         | <b>3%</b>  |
|                                | Criticism of consultation - no oppose option for several questions/loaded questions/too many questions/consultation promotion came too late  | 191                                | 1%         |
|                                | Insufficient/unclear information provided  | 135                                | 1%         |
|                                | Science and details behind these proposals is unclear/misleading/unproven. What is the baseline for data quoted? How was the charge level calculated? What are the CO <sub>2</sub> , NO <sub>x</sub> , etc, requirements for a ULEZ compliant vehicle? | 78                                 | 0%         |
|                                | Concern the results of the consultation will not be taken into account   | 65                                 | 0%         |
|                                | Other comment on the consultation  | 40                                 | 0%         |
|                                | Positive comment about consultation process  | 4                                  | 0%         |
|                                | <b>Total</b>   | <b>840</b>                         | <b>5%</b>  |
| <b>Other</b>                   | Problem has been created by previous government policy - encouraging people to buy diesel vehicles   | 321                                | 2%         |
|                                | Too similar to the Congestion Charge - targets same users  | 248                                | 2%         |
|                                | Consider other modes of transport - trains/aircraft/boats - or other sources of pollution  | 144                                | 1%         |

| Theme                          | Comment   | Open comments from all respondents | Percentage |
|--------------------------------|---|------------------------------------|------------|
|                                | Electricity is not a clean solution - particularly while the majority is produced from fossil fuels | 59                                 | 0%         |
|                                | Proposal should consider imposing vehicle noise standards as well                                   | 45                                 | 0%         |
|                                | Confusing having two different charging schemes running in simultaneously (ULEZ & CCZ)              | 23                                 | 0%         |
| <b>Future of the Scheme</b>    | <b>Total</b>  | <b>36</b>                          | <b>0%</b>  |
|                                | Concerned boundary will be extended in future/requirements will be made more stringent              | 36                                 | 0%         |
| <b>Request for information</b> | <b>Total</b>  | <b>31</b>                          | <b>0%</b>  |
|                                | Request for more detail on pollution statistics   | 19                                 | 0%         |
|                                | Will scheme go ahead if the UK leaves the EU?   | 12                                 | 0%         |
| <b>Out of scope</b>            | <b>Total</b>  | <b>85</b>                          | <b>1%</b>  |
|                                | Comment regarding the Congestion Charge   | 83                                 | 1%         |
|                                | Concerns regarding theft of new motorcycles - limited anti-theft and security functions on a bike   | 2                                  | 0%         |

## Appendix M: Borough emissions with ULEZ

|                        | Baseline Road Transport Emissions (tonnes, 2020) |      |       |         | With ULEZ Road Transport Emissions (tonnes, 2020) |      |       |         |
|------------------------|--|------|-------|---------|---|------|-------|---------|
|                        | NOx  | PM10 | PM2.5 | CO2     | NOx   | PM10 | PM2.5 | CO2     |
| Barking and Dagenham   | 287  | 44   | 21    | 132,413 | 262   | 44   | 21    | 132,006 |
| Barnet                 | 799  | 114  | 56    | 368,688 | 721   | 114  | 55    | 366,494 |
| Bexley                 | 387  | 58   | 28    | 176,592 | 351   | 58   | 28    | 175,966 |
| Brent                  | 462  | 67   | 32    | 202,309 | 415   | 67   | 32    | 200,349 |
| Bromley                | 556  | 87   | 42    | 241,063 | 504   | 87   | 42    | 240,123 |
| Camden                 | 399  | 46   | 23    | 165,770 | 304   | 44   | 21    | 156,677 |
| City                   | 133  | 13   | 7     | 50,771  | 67  | 11   | 5     | 43,464  |
| City of Westminster    | 697  | 74   | 38    | 273,606 | 464   | 68   | 33    | 246,216 |
| Croydon                | 524  | 79   | 38    | 225,976 | 474   | 79   | 38    | 224,947 |
| Ealing                 | 617  | 91   | 44    | 277,202 | 558   | 91   | 44    | 275,592 |
| Enfield                | 701  | 99   | 49    | 356,380 | 637   | 99   | 49    | 354,964 |
| Greenwich              | 473  | 70   | 34    | 209,247 | 423   | 70   | 33    | 207,010 |
| Hackney                | 317  | 39   | 19    | 130,286 | 265   | 38   | 18    | 126,613 |
| Hammersmith and Fulham | 272  | 35   | 17    | 113,921 | 229   | 35   | 17    | 110,771 |
| Haringey               | 333  | 44   | 21    | 138,334 | 280   | 43   | 21    | 134,780 |
| Harrow                 | 301  | 45   | 22    | 130,512 | 272   | 45   | 21    | 129,982 |
| Havering               | 603  | 86   | 43    | 320,312 | 549   | 86   | 43    | 319,570 |
| Hillingdon             | 786  | 114  | 56    | 375,889 | 710   | 114  | 56    | 373,563 |
| Hounslow               | 618  | 91   | 44    | 278,871 | 554   | 91   | 44    | 275,730 |
| Islington              | 261  | 30   | 15    | 103,662 | 204   | 29   | 14    | 98,875  |
| Kensington and Chelsea | 304  | 34   | 17    | 123,573 | 246   | 33   | 16    | 116,291 |
| Kingston               | 341  | 52   | 25    | 157,000 | 309   | 51   | 25    | 156,547 |
| Lambeth                | 433  | 54   | 26    | 174,812 | 345   | 52   | 25    | 167,979 |
| Lewisham               | 392  | 52   | 25    | 162,697 | 332   | 51   | 24    | 158,921 |
| Merton                 | 310  | 45   | 21    | 134,065 | 281   | 44   | 21    | 133,406 |
| Newham                 | 409  | 59   | 29    | 182,969 | 345   | 58   | 28    | 178,423 |
| Redbridge              | 499  | 78   | 38    | 238,005 | 451   | 77   | 37    | 236,556 |
| Richmond               | 361  | 54   | 26    | 159,191 | 325   | 54   | 26    | 158,273 |
| Southwark              | 439  | 53   | 26    | 175,355 | 342   | 51   | 24    | 167,855 |
| Sutton                 | 247  | 38   | 18    | 105,477 | 223   | 38   | 18    | 105,023 |
| Tower Hamlets          | 399  | 55   | 26    | 170,560 | 334   | 54   | 26    | 165,703 |
| Waltham Forest         | 375  | 55   | 27    | 167,763 | 335   | 55   | 26    | 165,808 |
| Wandsworth             | 416  | 56   | 27    | 177,073 | 354   | 55   | 26    | 173,242 |



|                               | Total Population | Total Population In Output Areas exceeding NO2 Limit Value - Baseline | Total Population In Output Areas exceeding NO2 Limit Value - with ULEZ | Percentage Change in Population Living In Output Areas Exceeding the NO2 Limit Values |
|-------------------------------|------------------|---|--|---|
|                               | 2020             | 2020  | 2020   | 2020  |
| <b>Barking and Dagenham</b>   | 223,361          | 3,296   | 2,939  | -11%  |
| <b>Barnet</b>                 | 406,996          | 13,569  | 7,083  | -48%  |
| <b>Bexley</b>                 | 248,979          | -   | -  |   |
| <b>Brent</b>                  | 348,194          | 30,631  | 19,504   | -36%  |
| <b>Bromley</b>                | 334,739          | -   | -  |   |
| <b>Camden</b>                 | 243,628          | 94,411  | 50,348   | -47%  |
| <b>City</b>                   | 8,363            | 5,028   | 1,539  | -69%  |
| <b>City of Westminster</b>    | 239,118          | 105,841   | 48,984   | -54%  |
| <b>Croydon</b>                | 398,288          | 130   | 130  | 0%  |
| <b>Ealing</b>                 | 368,057          | 8,207   | 5,551  | -32%  |
| <b>Enfield</b>                | 352,552          | 3,114   | 1,546  | -50%  |
| <b>Greenwich</b>              | 282,396          | 6,222   | 1,905  | -69%  |
| <b>Hackney</b>                | 281,565          | 22,900  | 8,029  | -65%  |
| <b>Hammersmith and Fulham</b> | 185,902          | 26,987  | 14,144   | -48%  |
| <b>Haringey</b>               | 282,647          | 12,727  | 7,226  | -43%  |
| <b>Harrow</b>                 | 263,980          | 1,163   | 1,163  | 0%  |
| <b>Havering</b>               | 259,418          | -   | -  |   |
| <b>Hillingdon</b>             | 315,838          | 599   | 232  | -61%  |
| <b>Hounslow</b>               | 290,790          | 9,086   | 4,638  | -49%  |
| <b>Islington</b>              | 237,251          | 40,156  | 13,073   | -67%  |
| <b>Kensington and Chelsea</b> | 155,709          | 54,260  | 33,442   | -38%  |
| <b>Kingston</b>               | 178,426          | 2,092   | 1,098  | -48%  |
| <b>Lambeth</b>                | 336,397          | 42,047  | 12,946   | -69%  |
| <b>Lewisham</b>               | 309,500          | 12,452  | 3,898  | -69%  |
| <b>Merton</b>                 | 221,272          | 905   | -  | -100%   |
| <b>Newham</b>                 | 365,346          | 15,055  | 5,844  | -61%  |
| <b>Redbridge</b>              | 321,640          | 5,836   | 3,665  | -37%  |
| <b>Richmond</b>               | 202,494          | 1,189   | 312  | -74%  |
| <b>Southwark</b>              | 321,392          | 55,990  | 14,492   | -74%  |
| <b>Sutton</b>                 | 211,701          | -   | -  |   |
| <b>Tower Hamlets</b>          | 309,073          | 46,985  | 23,091   | -51%  |
| <b>Waltham Forest</b>         | 294,159          | 9,167   | 4,952  | -46%  |
| <b>Wandsworth</b>             | 328,394          | 22,905  | 8,007  | -65%  |

|                        | Population weighted average concentration 2020 - Baseline |      |       | Population weighted average concentration 2020 - 'with ULEZ' |      |       | Change in population weighted average concentration 2020 (ug/m3) |       |       |
|------------------------|---|------|-------|--|------|-------|--|-------|-------|
|                        | NO2   | PM10 | PM2.5 | NO2  | PM10 | PM2.5 | NO2  | PM10  | PM2.5 |
| Barking and Dagenham   | 28  | 21   | 12    | 27   | 21   | 12    | - 0.9  | - 0.0 | - 0.0 |
| Barnet                 | 29  | 21   | 12    | 28   | 21   | 12    | - 1.0  | - 0.0 | - 0.0 |
| Bexley                 | 26  | 21   | 12    | 25   | 21   | 12    | - 0.8  | - 0.0 | - 0.0 |
| Brent                  | 32  | 22   | 13    | 31   | 22   | 13    | - 1.1  | - 0.0 | - 0.0 |
| Bromley                | 26  | 20   | 12    | 25   | 20   | 12    | - 0.8  | - 0.0 | - 0.0 |
| Camden                 | 39  | 23   | 14    | 37   | 23   | 14    | - 2.6  | - 0.1 | - 0.1 |
| City                   | 43  | 25   | 15    | 37   | 25   | 15    | - 6.1  | - 0.2 | - 0.2 |
| City of Westminster    | 41  | 24   | 14    | 37   | 24   | 14    | - 3.5  | - 0.1 | - 0.1 |
| Croydon                | 28  | 21   | 12    | 27   | 21   | 12    | - 0.9  | - 0.0 | - 0.0 |
| Ealing                 | 30  | 21   | 12    | 29   | 21   | 12    | - 1.0  | - 0.0 | - 0.0 |
| Enfield                | 27  | 21   | 12    | 26   | 21   | 12    | - 0.9  | - 0.0 | - 0.0 |
| Greenwich              | 30  | 21   | 13    | 29   | 21   | 13    | - 1.1  | - 0.0 | - 0.0 |
| Hackney                | 35  | 23   | 13    | 33   | 23   | 13    | - 1.8  | - 0.1 | - 0.0 |
| Hammersmith and Fulham | 35  | 23   | 13    | 34   | 23   | 13    | - 1.9  | - 0.1 | - 0.0 |
| Haringey               | 32  | 22   | 13    | 31   | 22   | 13    | - 1.5  | - 0.0 | - 0.0 |
| Harrow                 | 27  | 20   | 12    | 26   | 20   | 12    | - 0.8  | - 0.0 | - 0.0 |
| Havering               | 23  | 20   | 12    | 22   | 20   | 12    | - 0.6  | - 0.0 | - 0.0 |
| Hillingdon             | 26  | 20   | 12    | 25   | 20   | 12    | - 0.7  | - 0.0 | - 0.0 |
| Hounslow               | 31  | 21   | 12    | 30   | 21   | 12    | - 1.0  | - 0.0 | - 0.0 |
| Islington              | 36  | 23   | 13    | 34   | 23   | 13    | - 2.3  | - 0.1 | - 0.1 |
| Kensington and Chelsea | 39  | 23   | 14    | 37   | 23   | 13    | - 2.7  | - 0.1 | - 0.1 |
| Kingston               | 28  | 21   | 12    | 27   | 21   | 12    | - 1.0  | - 0.0 | - 0.0 |
| Lambeth                | 35  | 23   | 13    | 33   | 23   | 13    | - 2.0  | - 0.1 | - 0.0 |
| Lewisham               | 32  | 22   | 13    | 31   | 22   | 13    | - 1.4  | - 0.0 | - 0.0 |
| Merton                 | 30  | 21   | 12    | 29   | 21   | 12    | - 1.1  | - 0.0 | - 0.0 |
| Newham                 | 32  | 22   | 13    | 31   | 22   | 13    | - 1.4  | - 0.0 | - 0.0 |
| Redbridge              | 28  | 21   | 12    | 27   | 21   | 12    | - 1.0  | - 0.0 | - 0.0 |
| Richmond               | 29  | 21   | 12    | 28   | 21   | 12    | - 1.0  | - 0.0 | - 0.0 |
| Southwark              | 36  | 23   | 13    | 34   | 23   | 13    | - 2.3  | - 0.1 | - 0.1 |
| Sutton                 | 27  | 21   | 12    | 26   | 21   | 12    | - 0.9  | - 0.0 | - 0.0 |
| Tower Hamlets          | 36  | 23   | 13    | 34   | 23   | 13    | - 2.0  | - 0.1 | - 0.0 |
| Waltham Forest         | 30  | 22   | 13    | 29   | 22   | 13    | - 1.1  | - 0.0 | - 0.0 |
| Wandsworth             | 33  | 22   | 13    | 32   | 22   | 13    | - 1.6  | - 0.0 | - 0.0 |